## **TSD File Inventory Index**

US EPA RECORDS CENTER REGION 5



Date: June 1, 2004 Initial Mercino

acility Name Delicy Congr	alim	(Solverla función)	
acility Identification Number 09	11605	(Selverts Division) -972	
1 General Correspondence		B.2 Permit Docket (B.1.2)	
.2 Part A / Interim Status A . 2	1	1 Correspondence	/
1 Correspondence	17	2 All Other Permitting Documents (Not Part of the ARA) B.(.2(5), B.(.3, B.(.8(2)(B.1.4))	8
.2 Notification and Acknowledgment	\ \ \	C.1 Compliance - (Inspection Reports)  Au C. 2	
.3 Part A Application and Amendments	, y	C.2 Compliance/Enforcement	
4 Financial Insurance (Sudden, Non Sudden)	1	.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications ···	1
6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents	1
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	
1 Correspondence		.1 RFA Correspondence	
2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos	
1 Correspondence		4 RFA Reports り、ルサ	
2 Closure/Post Closure Plans, Certificates, etc		D. 2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring		1 RFI Correspondence	
1 Correspondence		2 RFI Workplan D. 2 2 (1)	
2 Reports		3 RFI Program Reports and Oversight	-
B.1 Administrative Record		4 RFI Draft /Final Report	

5 RELGAPP  D. 215	,	7 Lab data, Soil Sampling/Groundwater	
6 RFI QAPP Correspondence		8 Progress Reports	
7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
8 RFI Progress Reports D. 2.8		1 Administrative Record 3008(h) Order	
9 Interim Measures Correspondence		.2 Other Non-AR Documents	
10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
3 Corrective Action/Remediation Study		.1 Forms/Checklists	
1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		1 Correspondence	
.3 CMS Workplan		2 Reports	T
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	<b>†</b>
.5 Stabilization		G.1 Risk Assessment	Ť
.6 CMS Progress Reports		.1 Human/Ecological Assessment	T
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	1
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	†
1 CMI Correspondence		.4 Ecological - Administrative Record	†
.2 CMI Workplan		.5 Permitting	+
3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	+
4 CMI Draft/Final Reports	+	.7 Corrective Action/Remediation Implementation	+
5 CMI QAPP	+	8 Endangered Species Act	7
6 CMI Correspondence	$\dashv$	.9 Environmental Justice	+
<u></u>			

Note Transmittal Letter to Be Included with Reports Comments



## Land and Chemicals Division

	Notice of Violation and Inspection Report	rt/Cneckiist									
<u></u>	☐ No Violation Letter and Inspection Repo	rt/Checklist									
	∠Letter of Acknowledgment										
☐ Information Request											
	☐ Pre-Filing and Opportunity to Confer										
	☐ State Notification of Enforcement Action	1									
	Return to Compliance										
	☐ Inspection Report										
_											
Facility Name: <u>Det</u>	rex Corporation.										
Facility Location: 128	886 Eaton Ave	·									
/											
City: Detroit	State: MI										
U.S. EPA ID# <u>MID 091 605 972</u>											
U.S. EPA ID# MID	091 605 972										
		Phone: 6-7502									
U.S. EPA ID# MID  Assigned Staff P. A		Phone: 6-7502									
		Phone: 6-7502  Date									
Assigned Staff P. A	Atkociunas	Date									
Assigned Staff P. A	Atkociunas										
Assigned Staff P. A  Name  Paul Atkociunas	Atkociunas	Date									
Assigned Staff P. A  Name  Paul Atkociunas Author	Atkociunas	Date									
Name Paul Atkociunas Author Tamara Carnovsky	Signature  Lul	Date									
Name Paul Atkociunas Author Tamara Carnovsky Regional Counsel	Signature  Lul	Date									
Name Paul Atkociunas Author Tamara Carnovsky Regional Counsel Paul Little	Signature  Lul	Date									

## **Directions/Request for Clerical Support:**

After the Section Chief/Branch Chief signs this sheet and original letter:

Date stamp the cover letter; 1.

Make four copies of the contents of this folder: 2.

One copy for the assigned staff;

One copy for the section file;

One copy for the branch file; and

One copy for the official file.

- Make any additional copies for cc's or bcc's. 3.
- Mail the original certified mail and distribute office copies and cc=s and bcc=s. 4. Once the certified mail receipt is returned:
- File the certified mail receipt (green card), with this sign-off sheet and the official file 5. copy, and take to 7<sup>th</sup> floor RCRA file room;
- E-mail staff the date that the letter was received by facility. 6.



#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

#### REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

FEB 27 2009

REPLY TO THE ATTENTION OF:

LR-8J

## <u>CERTIFIED MAIL</u> <u>RETURN RECEIPT REQUESTED</u>

Mr. David Craig Manager of Environmental and Safety Compliance Detrex Corporation 24901 Northwestern Highway, Suite 410 Southfield, Michigan 48075

RE: RCRA Compliance Evaluation Inspection
Detrex Corporation
MID 091 605 972

Dear Mr. Craig:

On August 12, 2008, a representative from the U.S. Environmental Protection Agency inspected your installation located at 12886 Eaton Avenue, Detroit, Michigan. The purpose of the inspection was to evaluate compliance with certain requirements of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste.

As of this writing, based on information available to EPA, our review of the Inspection and responses to the Information Request has not resulted in any violations. This determination does not limit the applicability of the requirements evaluated, other RCRA regulations, or regulations under other environmental statutes. EPA and the Michigan Department of Environmental Quality will continue to evaluate your facility in the future.

If your have any questions regarding this letter, please contact Paul Atkociunas of my staff at (312) 886-7502.

Sincerely,

Willie H. Harris, P.E. Chief, RCRA Branch

Land and Chemicals Division

Cc: Tim Sonnerberg, MDEQ, Southeast District Office

# Eelex



#### CORPORATION

P.O. BOX 5111 • SOUTHFIELD, MI 48086-5111 • (248) 358-5800 • FAX (248) 358-5803 February 19, 2009

Mr. Paul Atkociunas USEPA, Region 5 77 West Jackson St Chicago, IL 60604 Attn: LR-8J

RE:

Site Inspection

Detrex Corporation 12886 Eaton Ave. Detroit, MI 48226

USEPA ID#: MID 091 605 972

Dear Mr. Atkociunas:

We have received USEPA's letter dated January 23, 2008 requesting additional information related to your inspection of our Facility on August 12, 2008. Prior to responding to the request for information as denoted in your letter, Detrex Corporation (**Detrex**) and Parts Cleaning Technologies, LLC (**PCT**) would like to provide a brief history as it relates to these two entities.

Prior to June of 2002, Detrex Corporation's Solvent Division sold solvents (generally halogenated solvents) and operated various TSDFs for the purpose of reclaiming the associated hazardous wastes. Due to declining sales, Detrex decided to exit the solvent distribution business. The solvent business was sold to the president of the Solvents Division in a Management buyout on June 1, 2002. At the time of the sale PCT purchased chemical inventories and certain assets associated with the sale and distribution of solvents. Under the sales agreement, Detrex agreed to lease part of their property to PCT for the purpose of operating their business, including the storing and selling of solvents. In exchange PCT agreed to provide the manpower necessary for Detrex to operate their Permitted Facility.

Although Detrex and PCT are separate entities, the response actions related to your request for information was a combined effort.

As per your request, Detrex would like to provide the following responses:

- 1. Identify all persons consulted in preparing the answers to the Request for Information:
  - a. Mr. David Craig, Detrex Manager of Environmental and Safety Compliance for Detrex Corporation
  - b. Mr. Casey McCausland, PCT Facility Manager
  - c. Mr. Mike Shimko, PCT Warehouseman and truck driver
  - d. Mr. Jim Goodrich, PCT Chemist
  - e. Mr. David Crandell, PCT President



- 2. Provide the contents of each of the eight containers located on the concrete pad north of Container Storage Area 11 observed during the EPA inspection on August 12, 2008:

  Based on a discussions with facility personnel the contents of the eight containers in question are as follows:
  - a. Two containers holding Toluene which were transferred into one new DOT container. The total weight of Toluene is 400 lbs. Both containers were intact at the time of transfer.
  - b. Two containers holding Isopropyl Alcohol which were transferred into two new DOT containers. The total weight of this material was 724 lbs. Both containers were intact at the time of transfer.
  - c. Two containers holding Nitromethane which were transferred into one new DOT container. The total weight of the combined containers is 438 lbs.
    - Figures 6 & 75 in your request letter suggest approximately 6" of material may have remained in the container in question which would correspond to approximately 7.8 gallons (6" / 42" X 55gal). The second container per Mr. Shimko contained less than 5 gallons of material (Mr. Shimko was able to physically able to pick the drum up by hand. The integrity of this container was not compromised.)
  - d. Two empty containers. The integrity of these containers was good. It is likely they were placed there for return to the vender that shipped solvent to Detrex.

NOTE: only one container was found to be compromised at the liquid air interface within the container; however, as insurance the contents of the remaining drums holding chemicals were transferred into new DOT containers during the inspection. All emptied containers were sent to a drum reconditioner.

- 3. For the contents of each of the eight containers identified in Request #2, provide the following:
  - a. The date the material was obtained, received and/or generated at the Facility:

    The date these chemicals were obtained is unknown. Based on a review of the sales agreement between PCT and Detrex these chemicals were not purchased by PCT as part of the transfer of business. Of the three chemicals in question only Isopropyl Alcohol has been purchased by PCT. As such the remaining chemicals would have been purchased prior to PCT's inception in June of 2002.

The vast majority of accounting activities for each division within Detrex Corporation are handled at the division itself. This would include physical inventories. Limited records are still available from prior to the sale as Detrex generally only retains records for 7 years. A review of records in storage verified purchase orders and chemical inventory reports from the former Solvent Division no longer exist. Bills of lading would also not exist as these are only retained for 2 years as required by law.

- b. A description of the material in each container at the time of receipt:
  - i. two containers held Toluene (flammable)
  - ii. two containers held Isopropyl Alcohol (IPA) and water (flammable)
  - iii. two containers held Nitromethane (flammable)



iv. two containers are unknown as they were empty at the time of the inspection.

There is a high probability these containers had deposits on them as they were stored outside with other containers from Chemcentral.

As a general note, flammable liquids are generally stored outside to comply with local building codes and the fire marshal.

- c. True, accurate, and complete copies of all records, but not limited to, manifests, bills of lading, etc. that document receipt of the material to the facility:

  See the response to request 3.a above.
- d. True, accurate, and complete copies of all records including, but not limited to, any reports/laboratory data for physical and/or chemical analysis, that document the material in each container and all applicable waste numbers.
  No analytical sheets are available from the manufacturer of these chemicals. However, Attachment A does contain the results of chemical analysis via Gas Chromatograph (GC) on the three compounds: Toluene, Isopropyl Alcohol, and Nitromethane. These tests were performed by PCT's in house chemist Mr. Jim Goodrich. A detailed discussion on the data is presented in the response to item 4.
- 4. For the contents of each container identified in Request #2, state whether the facility used the material as product, received the material as wastes or generated the material as wastes.

  All of the chemicals on the dock would have been purchased raw materials; they were NOT received as waste nor were they wastes generated at the site. These chemicals were likely purchased for the manufacture of product (Nitromethane for stabilizers) and/ or repackaged for sale (Toluene and IPA).

**IPA**: was likely purchased for sale to companies like Johnson Litograph (Per Mr. McCausland, PCT did sell IPA to Johnson Litograph; see Attachment B for a sales history under PCT). PCT lost this business in January of 2006 as they were no longer cost competitive with other suppliers. Although the IPA was contaminated with water (approximately 35% by weight), Johnson Litograph was willing to take the remaining material. Documentation of shipment to Johnson Litograph is also found in Attachment B.

**Toluene:** although the original use for this chemical is unknown, PCT does have a use for this material. It is being shipped to their Indianapolis branch to be used as a raw material in the manufacture of a line flush product that is sold to local paint shops.

**Nitromethane**: This material was likely purchased to manufacture stabilizers for halogenated solvents. It is not used in any current stabilizer formulations by PCT. Mr. McCausland had hoped to find a home for this material as he did with the IPA; however, due to the water content (80+%) there were no interested parties. As such this material is being sent out for disposal.

A review of 40 CFR part 261.33 indicates that Nitomethane does not carry a waste code, it does however have a flash point of 98 °F as determined by Mr. Goodrich. Therefore this material is being classified as a Hazardous Waste due to its ignitability characteristic (D001).

Figures 6 & 75 in USEPA's letter indicate one container held very little product (approximately

6") as of the date of recording. If no additional material had been removed this would equate to approximately 7.8 gallons. Per Mr. Shimko the second container held less than 5 gallons of Nitromethane. If the total estimated amount of Nitromethane was diluted with water to 55 gallons it would represent a concentration of approximately 22% by volume. Mr. Goodrich estimated a measured volumetric concentration of 15.5%.

We would once again like to point out the container shown in figure 86 failed at the top near the air liquid interface. Although Figure 86 does show what appears to be liquid near the bottom edge of the pallet, the top of pallet itself is dry, substantiating this container was not actively leaking.

5. For the contents of each container identified in Request #2, state whether the facility determined the materials to be hazardous waste as defined in Michigan Administrative Code (MAC) Rule 299.9203 (40 CFR 261.2). If the materials were determined to be wastes, explain in detail the Facility's rationale for such a determination and the date of determination.

The containers noted in request #2 held raw materials; prior to the date of Mr. Paul Atkociunas's inspection there was no reason to believe any of these materials had been contaminated with water. As raw materials they would not meet the definition of a solid waste or an abandoned material. In addition, as they were viewed as commercial chemical products (although two were not specifically listed in 261.33) they would not fall under the definition of speculative accumulation.

The status of chemicals in question are as follows:

**Isopropyl Alcohol**: This chemical is not a waste. Mr. McCausland contacted a former customer, Johnson Litograph who indicated they could use the IPA as is. Attachment B contains a copy of the bill of lading for the shipment of the IPA to Johnson Litograph.

**Toluene**: This chemical is not a waste. The toluene is being shipped to PCT's Indianapolis branch to be used as a raw material in the manufacture of a product they sell to paint shops as a line flush. A copy of the bill of lading for this shipment is included in Attachment B.

**Nitromethane**: as noted in response 4, this was originally purchased as a raw material but is now being classified as a hazardous waste under the characteristic waste code D001. Documentation related to the profiling and disposal of the nitromethane water mixture is presented in Attachment C.

- 6. For the contents of each container identified in Request #2, state whether the facility determined the materials to be hazardous waste as defined in MAC Rule 299.9203 [40 CFR 261.3]. If the contents were hazardous waste, provide the facility's rational for such a determination and the date of determination.

  Please see the response to request 5.
- 7. Identify the contents of the container that was observed to be leaking on August 12, 2008. Please note that the container was labeled with the words 'Nitromethane-6"-3'. Provide true, accurate, and complete copies of all documents that contain information responsive to





The container in question contained a mixture of Nitomethane and water. This was confirmed by Mr. Goodrich by performing an on-site GC analysis of this material. A result of that analysis is provided in Attachment A.

8. For the contents of each container identified in Request #2, state whether the facility made arrangements to have the waste disposed of (incinerated, land disposed, etc.). Provide true, accurate, and complete copies of all documents that contain information responsive to this request, including but not limited to, all hazardous waste manifests, bills of lading, etc, for shipments of each container from the facility.

Please see the response to question 5.

If you should have any questions regarding the responses to this Request for Information, please feel free to contact David Craig at 248.358.5800 ext. 131.

Best Regards,

**David Craig** 

CC: file

Facility - Casey McCausland

PCT – D. Crandell

Enclosures: Attachment A - GC analysis

Attachment B – sales records and bills of lading

Attachment C – profile and manifest.

### Certification

I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Robert M. Currie

Detrex Corporation -

VP, Secretary & General Counsel

David R. Crandell

Parts Cleaning Technologies -

President

## ATTACHMENT A

**PARTSCLEANING** 

PAGE 02

Client: PCT - Detroit Client ID: C. McCausi

Collected:

Analysis date: 01/30/2009 09:18:29 Method: Syringe inject (0.5 ul) Lab ID: Sample from Drum on

Description: Back Dock

Column: Rxi5-ms 30M X 0.25mm Carrier: HELIUM AT 12 PSI Sample: .Drum Labeled Toluene

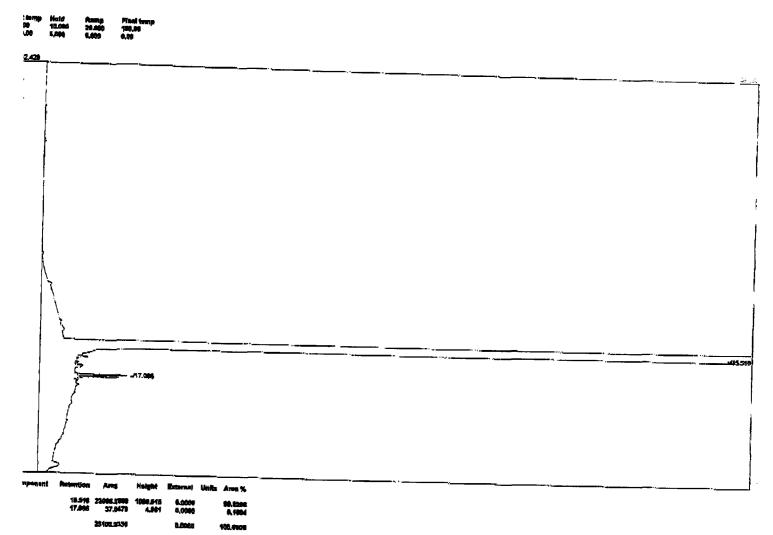
Operator: Jim Goodrich

Comments: THE DRUM IS A COMBINATIONS OF TWO DRUMS. THE PRODUCT IS A PURE,

COLORLESS MATERIAL. THE GAS CHROMATOGRAPHIC ANALYSIS SHOWS THAT THE COMBINED PRODUCT IS 99.8 % TOLUENE. THE WEIGHT OF THE DRUM IS 400

POUNDS (NET). THE SpG = 0.870

## emperature program:



, Cilent: Laboratory

· Client ID:

Collected: 08/18/08

Analysis date: 08/19/2008 10:05:20

Method: Syringe Inject (0.5 ul)
Lab ID: SEE COMMENTS SECT.

Description: SEE COMMENTS

Column: Rxi5-ms 30M X 0.25mm Carrier: HELIUM AT 12 PSI

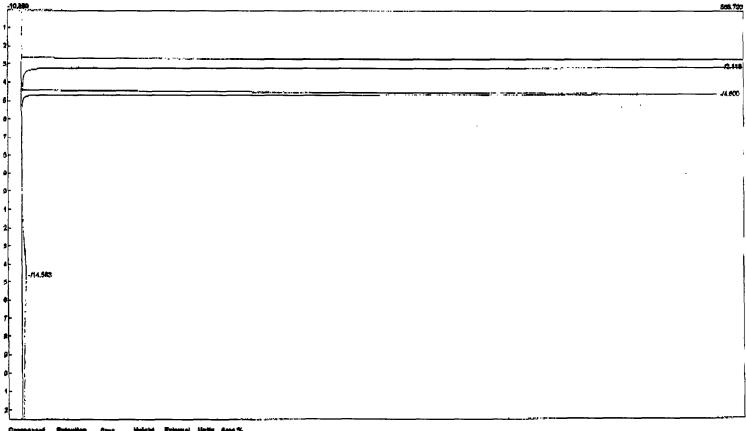
Temp. prog: GP.TEM

Operator: Jim Goodrich

Comments: SAMPLE CONSISTS OF: 2.5 Vol % ISOPROPANOL. IN DRY METHANOL (STANDARD).

### Temperature program:

M torny Hold Rump Final temp 1.00 10,000 20,000 100,00 10,00 0,000 0,00



2PH 4,000 4664,1467 642,000 9,000 94,2862 14,000 14,000 94,286 94,000 94,000 94,000 94,000 94,000 94,000 94,000 94,000 94,000 94,000 94,000 94,000 95







12886 Eaton Avenue Detroit, MI 48227

**Performance Without Compromise** 

February 5, 2009

To: Casey McCausland

From: Jim Goodrich

Subject: Analysis of drum in warehouse labeled "NITROMETHANE"

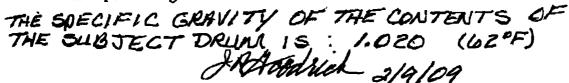
A sample of the contents of the subject drum was brown in color and has some finely divided sediment which appears to be iron rust. The sample has a mild odor similar to nitromethane. The sample also appears to contain water. This liquid could not be injected into the gas chromatograph (GC) due to the rust which would destroy the analytical column. It was decided to extract the organics from the water sample using analytical grade trichloroethylene (SIGMA-ALDRICH 372145-500ml) which will be referred to as "TCE".

A 250.0 ml sample from the subject drum was extracted for one minute with 20.0 ml of TCE. A standard was prepared by adding 10.0 ml of reagent Nitromethane (SIGMA-ALDRICH 270423-100ml) to 250.0 ml distilled water. The standard was extracted with 20.0 ml of TCE.

A GC analysis of the TCE (GC-1) was run to verify the no peaks were present where nitromethane elutes. The TCE was acceptable. A GC analysis of the TCE extract of the "nitromethane in water " standard GC-2 was run. The nitromethane peak eluted at 6.783 minutes. A GC analysis of the sample from the subject drum (GC-3) was run. However, the nitromethane peak was so large that the retention time was shifted and was 7.400 minutes. To bring the retention time into a proper range, the TCE extract was diluted 1 to 10 in reagent methylene chloride (SIGMA-ALDRICH 650463-1L). A GC analysis (GC-4) showed the nitromethane peak to have a retention time of 6.683 minutes.

The concentration of nitromethane in the standard is 3.85 volume percent. The ratio of TCE to nitromethane (GC-2) is 0.056. The ratio of nitromethane to TCE in the subject drum sample TCE extraction after diluting 1 to 10 in methylene chloride (GC-4) is 0.226.

Therefore, the concentration of nitromethane in the subject drum is (0.226 / 0.056) X 3.85 or 15.5 volume percent. After "sticking" the drum it was determined the drum contains 48 gallons. Therefore, the volume of nitromethane in the drum is 48 X 0.155 which equals 7.44 gallons.



PARTSCLEANING

02/09/2009 09:25 3134 CHENT: PCT - Detroit Client ID: C. McCausi

Collected:

Analysis date: 02/05/2009 11:53:10 Method: Syringe Inject (0.5 ul) Lab ID: Reag. Trichloroethylene

Description: (Reagent TCE)

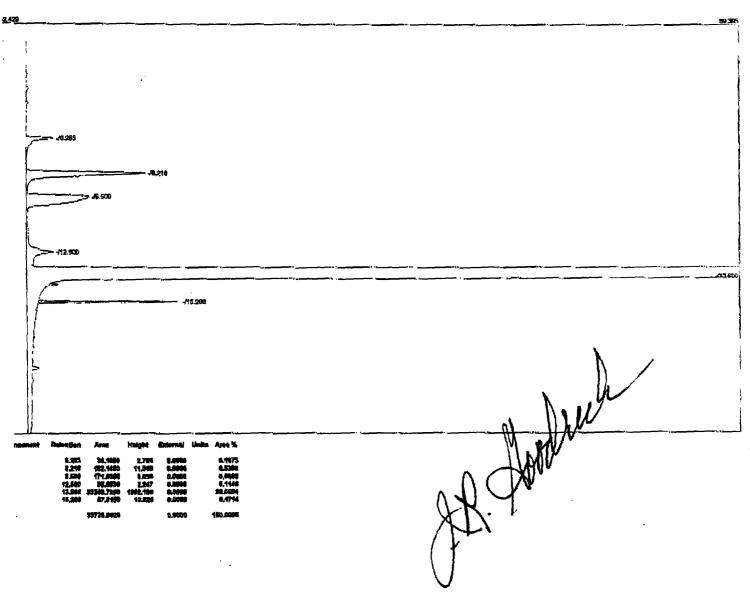
Column: Rxi5-ms 30M X 0.25mm Carrier: HELIUM AT 12 PSI

Sample:

Operator: Jim Goodrich

Comments:

'emperature program:



02/09/2009 09:25 3134918044

Client: PCT - Detroit
Client ID: C, McCausi

18.0

Collected:

Analysis date: 02/05/2009 13:19:58

Method: Syringe Inject (0.5 ul)

Lab ID: Analysis of Nitromethane

Description: Standard

Column: RxI5-ms 30M X 0.25mm Carrier: HELIUM AT 12 PSI

Sample:

Operator: Jim Goodrich

Comments: PROCEDURE: Extracted 250.0 ml of Nitromethane Standard with 20 ml reagent

Trichloroethylene (TCE) for 1.0 minute. Separated TCE layer

and injected 0.5 ul for GC analysis.

The Nitromethane Standard is 20.0 ml Nitromethane in 250.0 ml distilled water.

### emperature program:

temp Hold Rump Flashimp 10 \$0,000 20,000 100,00 .88 6,000 0,000 0.00 2,429 Johnson Client: PCT - Detroit
Client ID: C. McCaus!

Collected:

Analysis date: 02/05/2009 12:36:52

Method: Syringe Inject (0.5 ul)

Lab ID: Analysis of Sample from Description: "Nitromethane Drum"

Column: Rxi5-ms 30M X 0.25mm

Column: KXI5-ms 30M X 0.25mi | Carrier: HELIUM AT 12 PSI

Sample:

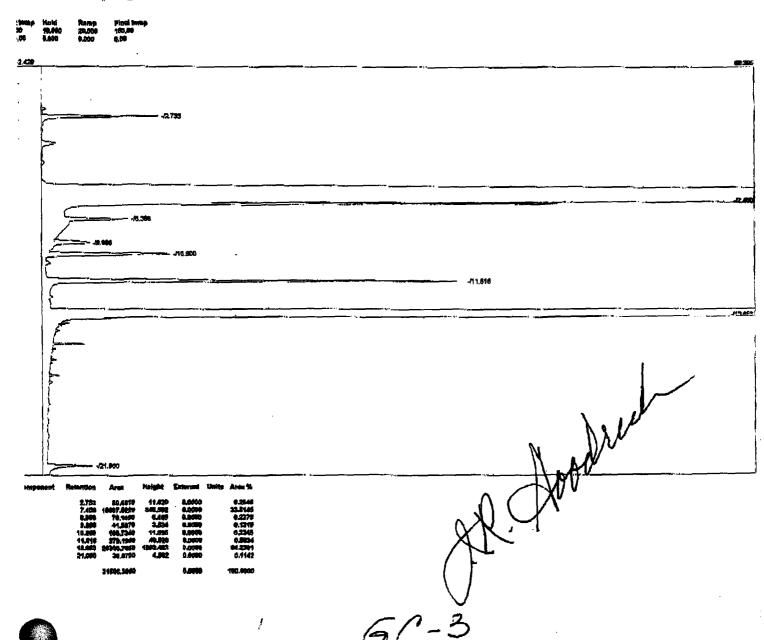
Operator: Jim Goodrich

Comments: PROCEDURE: Extracted 250.0 ml of sample from "Nitromethane drum" with 20 ml

reagent Trichloroethylene (TCE) for 1.0 minute. Separated TCE layer

and injected 0.5 ul for GC analysis.

### emperature program:



## ATTACHMENT B

2487997474

4:04 PM 01/27/09 Accrual Busin

## PARTS CLEANING TECHNOLOGIES, LLC. Sales by Customer Detail

June 1, 2002 through January 27, 2009

Dete	Date Num Momo		Name	Qty
10/08/2003	52792	ISOPROPYL ALCOHOL	JOHNSTON LITOGRAPH	1.00
10/20/2003	52837	ISOPROPYL ALCOHOL	JOHNSTON LITOGRAPH	2.00
11/11/2003	52912	ISOPROPYL ALCOHOL	JOHNSTON LITOGRAPH	1.00
11/30/2003	52971	ISOPROPYL ALCOHOL	JOHNSTON LITOGRAPH	3.00
12/23/2003	53053	ISOPROPYL ALCOHOL	JOHNSTON LITOGRAPH	1.00
01/21/2004	53101	ISOPROPYL ALCOHOL	JOHNSTON LITOGRAPH	2.00
01/26/2004	63112	isopropyi Alcohol (2 -5 galion palls)	JOHNSTON LITOGRAPH	2.00
02/12/2004	53168	hopropyl Alcuhol	JOHNSTON LITOGRAPH	2.00
03/01/2004	63236	leopropyl Alcohol	JOHNSTON LITOGRAPH	3.00
03/25/2004	53283	ISOPROPYL ALCOHOL	JOHNSTON LITOGRAPH	1.00
04/16/2004	53347	ISOPROPYL ALCOHOL	JOHNSTON LITOGRAPH	3.00
06/18/2004	53540	ISOPROPYL ALCOHOL	JOHNSTON LITOGRAPH	3.00
07/22/2004	53605	ISOPROPYL ALCOHOL	JOHNSTON LITOGRAPH	3.00
09/28/2004	53816	Anhydrous isopropyi Alcohol 99.9%	JOHNSTON LITOGRAPH	2.00
10/21/2004	53877	ANHYDROUS ISOPROPYL ALCOHOL 99.9%	JOHNSTON LITOGRAPH	3.00
11/30/2004	53978	ANHYDROUS ISOPROPYL ALCOHOL 99.9%	JOHNSTON LITOGRAPH	3.00
01/20/2005	54082	ANHYDROUS ISOPROPYL ALCOHOL 99.9%	JOHNSTON LITOGRAPH	3.00
02/21/2005	54169	ISOPROPYL ALCOHOL 89,9%	JOHNSTON LITOGRAPH	2.00
03/24/2005	54253	ANHYDROUS ISOPROPYL ALCOHOL 99.9%	JOHNSTON LITOGRAPH	724.00
04/26/2005	54324	ISOPROPYL ALCOHOL 99.9%	JOHNSTON LITOGRAPH	724.00
05/18/2000	54380	ISOPROPYL ALCOHOL 29.9%	JOHNSTON LITOGRAPH	1,086.00
06/27/2006	54485	ISOPROPYL ALCOHOL	JOHNSTON LITOGRAPH	1.00
06/30/2005	54496	SOPROPYL ALCOHOL 99.9%	JOHNSTON LITOGRAPH	724.00
07/25/2005	54588	ANHYDROUS ISOPROPYL ALCOHOL	JOHNSTON LITOGRAPH	1,086.00
08/29/2005	54672	99.9% ISOPROPYL ALCOHOL	JOHNSTON LITOGRAPH	724.00
99/27/2005	54736	ANHYDROUS ISOPROPYL ALCOHOL	JOHNSTON LITOGRAPH	724,00
10/21/2005	54805	ISOPROPYL ALCOHOL 99,9%	JOHNSTON LITOGRAPH	724.00
11/17/2005	54862	ANHYDROUS ISOPROPYL ALCOHOL 99,9%	JOHNSTON LITOGRAPH	724.00
12/21/2005	54941	99,9% ANHYDROUS ISOPROPYL ALCOHOL	JOHNSTON LITOGRAPH	1,086.00
01/31/2006	55021	ANHYDROUS ISOPROPYL ALCOHOL	JOHNSTON LITOGRAPH	1,086.00
08/19/2008	953	isopropanol alcohol	JOHNSTON LITOGRAPH	724.00



Invoice

## DADTS CLEANING TECHNOLOGIES, LLC.

(Formerly Detrex Corporation) 12886 Eaton Avenue Detroit, Michigan 48227 (313) 491-4550

Date	Involce #
8/21/2008	1611

Bill To
JOHNSTON LITOGRAPH 11334 HUNT
ROMULUS, MICHIGAN 48174
ATTN: JERRY MARSH

Pickup Location

JOHNSTON LITOGRAPH

11334 HUNT

ROMULUS, MICHIGAN 48174

P.O. Number	er Terms Rep Ship Date Ship Via Bil					Lading #	Manifest #
	Net 30	0000	8/21/2008	PCT TRU			··
Quantity	Approval #		Descri	ption		Price Each	\$ rac
1	3574	ISOPRO 724#)	PANOL ALC	OHOL (2 DRU	MS =	10.00	10.00
		DRUM GIVEN		35% WATER	-		

Remit to: Parts Cleaning Technologies 12886 Eaton Avenue Detroit, Michigan 48227

(313) 491-4550

Thank You For Your Business!

Total

\$10.00

**Balance Due** 

\$10.00

## LL OF LADING

Y RESPONSE ± 800 424-9300 **受難的OUR EMERGENC** 

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## **Parts Cleaning Technologies**

8/19/2008 DATE

NAME OF CARRIERI

O: **XONSIGNEE** TREET ESTINATION

)RDER#

JOHNSTON LITHOGRAPH

11334 HUNT ST.

ROMULUS, MICH 48174

FROM; PARTS CLEANING TECHNOLOGIES, LLC

12886 EATON AVENUE **DETROIT, MICHIGAN 48227** 

(313) 491-4550

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i i Militari Milit	1	1.73		kan julija di kamingan kanada di katakna into kanada	to to see	Unizurd Ulars	File Number	Packing Group	Mill (Gerif (Company) Commence	Empreenty Pary rose U
!	DRUMS	X	ISOPROPA	NOL ALCOHOL		3	UNIZIA	11	724	160
			ATTN: MR.	JERRY MARSH	•					
			NO CHARG	E, NO TRANS.						
			Denms	Carolain 35%	HATER.					
alue, /riting /rope	shippers are req the agreed of ity. The agreed or de	-Where the rate is dependent or ppers are required to state specificalle agreed or declared value of agreed or declared value of the pro- specifically stated by the shipper		Subject to Section 7 of shipment is to be deliver without recourse on the conshell sign the following staten. The carrier shall not shipment without payment of	ed to the consignee usignor, the consignor nent.		FREIGH	r ch	ARGE	<b>S</b> .
ot ex	ceading	per	· •	charges.		☐ F	Prepaid		Collect	
				(Signature of Consig	nor)			<del></del>		

RECEIVED, subject to the classifications and lawfully filed tariffs in effect on the date of the Issue of this Bill of Lading, the property described above is in pairent good order, except as noted (contents and condition of coments packages unknown), marked, consigned, and destined as indicated above which said arrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to arry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination, it is mutually agreed as to ach carrier of all or any of, said property over all or any portion of said route to destination and as to each party at any time interested in all or day or said powering described to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification of the said terms and conditions are

ereby agreed to by the shipper and accepted for himself and his	s assigns.		
In is to certify that the above named insterials are properly classified, described, packaged, artised and libbolish and are in proper carefuler for transportation according to the applicable quistions of the Department of Transportation	PEALARDS RECOMMEND	CLACARDS  Oriver's Signature;	
SHIPPER: PARTS CLEANING TECHNOLOGIES, LLC	AGENT L'afael	Shinko	_
	ARINE STATE	80-16-8 <sup>th</sup>	_

PCT

## BILL OF LADING

24 HOUR EMERGENCY RESPONSE # 800-424-9300

<b>A</b>				Parts (	Cleaning	Techno	logies	D.	2/1	19/20	09			
•				Į.	NAME OF C	ARRIER	· · · · · · · · · · · · · · · · · · ·		· · · · · · · · · · · · · · · · · · ·			-		
CONSIGNEE 2263 DISTRIBUTO			RIBUTORS DRIVE 12886 EAT						LEANING TECHNOLOGIES, LLC TON AVENUE , MICHIGAN 48227 11-4550					
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			ERG 130											
value, s writing propert Tr is nere	the agreed of y. s agreed or de- by specifically s	uired to st or declar clared value	ependent on the tate specifically in red value of the use of the shipper to be	shipment is without reconstruction sign the call sign the call shipment wi	t to Section 7 of to be dalive ourse on the co defollowing state arrier shall not thout payment	red to the co malgner, the co ment. make delivery	nsignee nsignor of this	F	REIGH	T CH,	ARGES	<b>3</b>		
not exc	eeding	PAT		charges.	(Signature of Cone	gnor)		P	repaid		Collect			
apparer carrier ( carry to each ca that eve Sh	nt good order, a the word carrier its usual place prior of all or an ary service to be proper hereby or	xcept as being und of deliven y of, said performed that the performance of the performanc	classifications and roted (contents and derstood throughou at said destination property over all old thereunder shall but he is familier with accepted for his	d condition of it this contract i, if on its rout any portion of a subject to a in all the bill o	f contents pack t as meaning an te, otherwise to of said route to c Il the bill of ledin if lading terms :	ages unknown), y person or corp deliver to anoth lestination and : ig terms and cor	marked, cone poration in poss ar camer on the as to each part aditions in the c	ighed, an ression of e route to y at any l roverning	id destined as If the property Is said destinat Lime interested I dassification	indicated under the ion, it is not in all or on the da	d above which contract) ac nutually agree any of said page te of shipme	ch said prees in ed as to property,		
The is to committee and requirements	icity that its above nai	med seasonials to over condition to sport pro-	or properly classified, descri to transportation according to C. McCaus la	an abtention	20042400 03590023		gganang Gelungus	<b></b> -	res No r's Signature:	- Furnishe	ed by carrier			
SHIP	PER: PARTS (	CLEANIN	G TECHNOLOG	ies, llc	AGENT									
BEINT	<del></del>		٠.٤	, 	PRINT & SIGN				! 	DATE	·	<b>-</b>		

## ATTACHMENT C



12886 Eaton Avenue Detroit, MI 48227

Performance Without Compromise

February 12, 2009

To: Casey McCausland

Subject: Flash Point of contents of the drum in warehouse labeled NITROMETHANE

A sample of the contents of the subject drum was taken on 02/12/09. A flash point of the sample was run on a Pensky-Martin Flash Point tester (closed cup). The results of the test indicate that the flash point of the contents of the subject drum is 98 degrees F.

cc: David Craig - Detrex Corporation

-	<b>3</b> 2 P	int or type. (Form design			er.)	_						п Арргома	d. OME	No. 205	D-0039
1	UNIFORM HAZARDOUS 1. Generator ID Number 2. Page 1 WASTE MANIFEST NIDO91605972 1							1991cy Response 800-424		4 Marifest		154	1	JJI	
		Merator's Name and Multip	1: D	etrex Corporation 2886 Enton Ave. etrait 13-491-4550	n - Detroit Mi	48227	General	or's Site Address	(if chillerents the			<u> </u>			<del> </del> 
1		erator's Phone; encoorter 1 Company Name					L		<del></del>	U.S. EPAID	Number				
Parts Cleaning Technologies 313-491-4550											-	42633	33		- [
	7. To	anaporter 2 Company Name		Crown	313-824-58	340				U.S. EPA ID N	lumber				
	* Dr	NOTTY 1 THE belgrated Facility Name and	scortation	<del></del>		<del></del> -						08727	<b>5</b>		
		ily's Phone:		Petro Chem Proc 121 Lycaste Detroit 113-824-5840	essing Group Mi	48214				U.S. EPA IO I		06152	298		
	So. HM	9b. U.S. DOT Description and Faciling Group (if or		Shipping Name, Hezen	I Class, ID Numbe	Γ,		10, Contain No.	Type	11. Total Quantity	12, Unik W1,/Vol.	13	. Waste	Codes	1
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		murked and labeled/placer Exporter, I certify that the o	ded, and ere in all re	espects in proper condi	ion for transport at	lags at anilhood	cable into	mational and nation	onal governme	utej uednjegous na nie brobei su	, if expart at	iipmentaho	(am to	rmary	ì
l		I certify that the waste mini	mization statement	identified in 40 CFR 28	2.27(a) (if i am a la	inge quantity ger	nemitor) o	(b) (if i am a sma	draway devi	enaltor) is true.					
l	Gene	arator's/Offeror's Printed/Typ	and Name	···		Si <sub>į</sub>	gnoture					l I	iónith L	Daiy	Aent )
ᆂ	18, 1	nternational Shipments				سلــــــــــــــــــــــــــــــــــــ		Deat of and	الدراء				!		
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TER	_	remsporter Acknowledgment sporter 1 Printed/Typed Ner	<del></del>	lais		- CL	endeng					71	anth	Day	Year
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  -	44	Alleman Farith In Con-	man .					tanifest Reference	Number:	U.S. EPA ID	Number		, 		
FACILITY	180.	Alternate Facility (or Gener	<b>(4)37</b> )							A14 BULLIN	, married				Ì
	Faci	lity's Phone:								1					لب
DESIGNATED	18C.	Signature of Alternate Fact	lity (or Generalist)									\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	Month	Day	Year
HGN	19.	Hexardoue Waste Report M	enagement Mathod	Codes (i.e., codes for	Tarandolu warte t	realment, dispor	ud, and re	cycling systems)						L	
DE	1.		· · · · · · · · · · · · · · · · ·	2.		3.	<del></del>			4	1,0				i
1	<u></u>	Designated Facility Owner	M Assultan Carlot	Man of search of factor	مر ما المام و المام		محدد الموالات	and my restant to the	m 18e						
}		Designated Facility Owner of Med/Typed Name	w Operator: Centifica		COLUMN (TORRESTE COL		iduatino	IIII IN DANGI CA III					Month	Day	Year
1				$\cdot t$		1						1.		L	

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PCT		F

ALL fields must be completed upon submission.	Process Code	
Incomplete profiles will NOT be approved.	Profile #	
A - Generator Information S.I.C.NAICS Code: EPA ID #: MID091605972	-	
Name: Detrex Corporation		
Site Address: 12886 Enton Ave City: Det port		
Mahing Address;		p: 48227
Contact Anne Miller	State: 23	<b>D</b> :
Total State Court Emply		<del></del>
B - Billing/Broker Information		
Name: Parts Cleaning Technologies		
Address: 12888 Enton Ave City: Detroit	State: M Z	o: 412M
Contact: Anne Miller Phone: 313-491-4550 Fax: 313-491-8044 Email:	amiller@partsclear	ning.net
Salesberson Cocov		
C - Waste Information	<del></del>	
State Waste Code(s) EPA Waste Code(s) D001		
Waste Common Name Nitro Methana Consulta Dance Color	184	<del></del>
Waste Common Name Nitro Methane Generating Process Old Outdated Product With Treatment/Disposal Restrictions		
Analysis Attaches Civilian Control of the Control o		
Agrical Company Compan	Enclosed Tyes	⊠ No
Chianina Parmana Davida		<del></del>
Total Miles	Li Other	<del></del>
Container Type  Bulk Liquid  Bulk Solid  Container (Size/Type) 55		
D - Physical Characteristics		
Physical State @ 70°F 🔲 Gas 🔯 Liquid 🔲 Studge 📋 Solid 🔲 Debris 🔲 Monolithic	Labpack	Loosepack
Layer(s) 🖾 Single Phase 🔲 Bi-Layered 🔲 Multi-layered Describe	····	
Free Liquids None Yes Liquid Range 100 - % Solid Range	%	
Odor None Mild Strong Describe Solvent		
Specific Gravity		
Flash Point □ <73°F ☑ 73 - 100°F □ 101 - 141°F □ 141 - 200°F □ >200°F □ N/A	Actual	
Flash Test Method   MSDS   Generator Knowledge   Open Cup   Closed Cup   None		
>H □ ≤2.0 □ 2.1 ~ 5.9 図 6,0 ~ 8.0 □ 6.1 ~ 12.4 □ ≥12.5 Actual		
Color Brown Appearance Liquid Shock Sensitive ☐ Yes ☑ No	Water Reactive	🗓 Yes 🔯 No
Fuel Characteristics BTU/lb Halogens % Water % 🔲 Free 🔘 N	liscible 🗀 Heal	ed Material (>140°F)
5 - Affernation Occupations - I to the compte new of the deflections		
= Miscellaneous Questions   Is the waste any of the following?  gritable Solid	Paritire Parelys and	☐ Yes ☒ No
	Positive Carcinogens	<del>-</del> -
· · · · · · · · · · · · · · · · · · ·	es (Benzene, etc.)	☐ Yes  ☐ No
Nater Reactive ☐ Yes ☒ No Biological ☐ Yes ☒ No If yes, specify		T Van Maka
Diddizer     ☐ Yes     ☒ No     Activated Carbon     ☐ Yes     ☒ No     Asbestos		☐ Yes 🖾 No
titro Callulose/Lacquer Dust ☐ Yes ☑ No if yes, specify		
- Metals		
Metal Code Generator Knowledge   TCLP   Total Metal Code Generator	Knowledge	TCLP   Total
trsenic D004 ⊠<8ppmppm Lead D008 ⊠<5ppm		ppm
Retium D005 ⊠<100ppm ppm Mercury D009 ⊠<0.2pp	m	pom
Salenium D008 ⊠<1ppmppm		ppm
Chromium D007 ⊠<5ppmppm Sliver D011 ⊠<5ppm	ب <del>عیدی</del> ہ	ppm
teristic (D012-D043)  ☐ TCLP ☐ Total  ☐ Generator Knowledge		

G - Tordes		Ī				<i>y</i> ,			
vice	None	Analysia Analysia	Toxics	None	Anabraia	Toxics		<u>}2</u>	الكنفلات
Bs		ppm	Ures/Thioures		ppm	Phosphorous Compos	_	<b>8</b>	החקפ
Dioxins	⊠	ppm	Phenois		pom	Cyanides: Reactive	<i>(</i> ),		ppm
Herbicides		DØrhi	Phenolics		ppm	Cyanides: Amenable	8		ppm
HOCs		ppm	TOC		ppm	Cyanides: Total	•	⊠	pom
Aromatic Amines	8	ppm ·	VOCs	⊠ .	ppm	Sulfides: Reactive			
Pesticides	<b>2</b>	DOM	Quinones	≅ .	ppm	Sulfides: Total			mqq inqq
Fungicides .	<b>S</b>	PPITI	Ammonia	⊠ .	ppm	Sumoes. Total		<u>ـــ</u>	ppiii.
		1	· = · KIPAINS	-	· · · · · · · · · · · · · · · · · · ·				
H - Chemical Con		j							
Chemical Name (	Se Specific, N	lo Trade Nam	<u> </u>					<u>Min</u>	Max
Water	····					····		80%	90%
Nitro Methane	<del></del>				····			10%	20%
			<del></del>					- %	
							_	%	%
								%	₩
								<u>%</u>	- %
<del></del>								<u>%</u>	<u></u> %
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								%_	%
Hazard Class		erg# ]	128 UNINAF	<del>,</del>	Packaging Group _	Reportable Quantil	y (RQ) in	lbs	
J - Regulatory Inf USEPA regulated		J meta?	⊠ Yes □ No		Explosive material?		☐ Yes	⊠ No	
Subject to categor			☐ Yes ☑ No		Does this waste cont	ain frights exhectos?	☐ Yes	⊠ No	
-		e stanoarda i	☐ Yes ⊠ No		*** ,	ain non-friable asbestos?	☐ Yes	⊠ No	
TSCA regulated F		•	☐ Yes ⊠ No		infectious or medical		☐ Yes		
CERCLA desnup			☐ Yes ⊠ No			opert CC regulations?	☐ Yes		
Dioxin bearing wa	. '	TK 401,31	☐ Yes ⊠ No		State requisted wast	_	Yes		
Radioactive waste	;r 	<b>-</b>	☐ tea ⊠ uo		Offic leading was	<b>0</b> ,			
K - Lendben Info	mation	j						<b></b>	<b>5</b> 141.
Naste Subject to	Land Diepoe	ai Restrictions		_		testriction Notification attac		_	oN □ e
Does this waste r	nest definitio	n of RCRA Haz	cardous debris? 🔲 Yes	⊠ No		federal treatment standards			8 🔀 No
l'his waste le a	☐ Wastewa	kar 🔯 Non-	Westewater		is an Underlying Haz	randous Constituent form R	equired?	Πλ	<u> </u>
ind personal knowle included and beli-	odge of Viose II of Furthermon	ndiyidusis respor s. no ma <b>teriai fa</b> d	taine for supprying or opening	the information and a state of the same of	metion contained and aut sition, the information con ation misleading. I under	braited in this and all attached tained herein is true, excurate, stand that others may rely on the	iocuments. and compl nis represe	. Based on ele to the b ntation and	my inquiry est of my warranty in
he handling and po	scessing of the	waste material d	lescribed herein.						_
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ure:	An	ላ ነሊ ዓ	- Mille					— <u> </u>	
								DATE	



## Philip Services Corporation RCRA Land Disposal Restriction Notification Form

3134918044

This form is applicable to characteristic wastes (D Codes), listed wastes (F, K, U, and P codes), and Hazardous Debris

•											
	nerato				S EPA	/ ID#		2		_	
Pro	file#:	NEW-NITRO METHANE/WAT		Manifest #:			Line Item:		الدين المراجع		
stan Purs	ne wastes identified on this form are subject to the land disposal restrictions of 40 CFR Pert 268. The wastes do not meet the treatment anderds specified in Part 268, Subpart D or do not meet the applicable prohibition levels specified in 268.32 or RCRA Section 3004(d). ursuant to 40 CFR 268.7(a), the required information applicable to each waste is identified below. COMPLETE ALL SECTIONS FOR ALL PA WASTE CODES IN THE WASTE STREAM.										
	TION ( stawater	1) Treatability Gross contain less then 1% filter	up (Check t rable solids a	ne appropriate box): nd less then 1% Total Organ	ic Carbo		/astewater	<b>Ø</b> 1	lonwast	lewater	
SEC	MOIT:	2) Characteristic E	PA Waste (	Codec (Check all boxes t	het app	ly):					
	D001 Ignitable Characteristic Westes, except for the 261.21(a)(1) High TOC Subcategory (If this box is checked, Underlying Hazardous Constituents Table must be completed and attached with this shipment.)										
X	2 D001 High TOC Ignitable Characteristic Liquids Subcategory based on 40 CFR 281.21(a)(1)- Greater than or equal to 10% total organic carbon. (Note: This subcategory consists of nonwestewaters only.)										
	DOO2	Corrosiva Characteristic	: Wastes Hazardous C	onstituents Table must be c	omplete	d and at	tached with this shipmen	t)			
	D003	Reactive Cvanides Sub	category bar								
	D003 (If this i	Other Reactives Subcat tox is checked, Underlying	legory based Hazardous C	i on 261.23(a)(1) onstituents Table must be o	omplete	d end at	teched with this shipmen	t.)			
	D003	Reactive Suifides Subc	ategory basi	nd on 261.23(a)(5)							
	D003	Water Reactives Subce	tegory base	d on 261.23(a)(2),(3),and	i (4). <i>(</i> N	ote:This	auboategory consists of	ימסחי	vestewat	ers only.)	
		Cadmium containing be									
		Lead acid batteries									
HD	004-43	boxes are checked, Un	derlying Ha	zardous Constituents 1	able m	ust be	completed and attach	ed w	ith this s	shipment.	
		Arsenic		Barium			Cadmium			Chromium	
	D006		ligh mercur	inorganic(>260 mg/kg to	otal), in	duding	incinerator residue ar	nd re	sidues f	from RMERC	
				otel), not including incine						All D009 Wastewater	\$
		Low mercury (<280 mg					Selenium		D011	Silver	
$\bar{\Box}$		Endrin		Lindane		D014	Methoxychlor		D015	Toxaphene	
			D017	2,4,5-TP(Sylvex)		<b>D</b> 018	Benzene		D019	Carbon tetrachloride	)
		Chlordane		Chlorobenzene		0022	Chloroform		D023	o-Cresol	
		m-Cresol	D025	p-Cresol		D026	Cresols(Total)		D027	p-Dichlorobenzene	
		1,2-Dichloroethane		1,1-Dichlorotheylene		D030	2,4-Dinitrotoluene		D031	Heptachlor	
		Hexachlorobenzene		Hexachlorobutadiene		D034	Hexachiorcethane		D035	Methyl ethyl ketone	
		Nitrobenzene	_	Pentachlorophenol		D038	Pyridine		D039	Tetrachioroethylene	ŀ
		Trichloroethylene		2,4,5-Trichlorophenol		D042	2,4,6-Trichloropheno		D043	Vinyl Chloride	
_				•							
	CTION	(2.4) <b>3000 00</b> -1110 0000	aa laaabata				_				
SE	CTION this bax F039	(3A) <b>F039 Multipour</b> is checked, Underlying Hea Multisource leachate.	ue resumant ardous Cons	Nuents Table must be comp	jeted en	d attack	ned with this shipment)				





## Philip Services Corporation RCRA Land Disposal Restriction Notification Form

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This form is applicable to characteristic wastes (D Codes), listed wastes (F, K, U, and P codes), and Hazardous Debris F001-F005 Spent Solvents Check all F-Code number(s) that apply, and identify all the individual constituents that are present in the weste atream. Hazardous waste description Regulated Hazardous constituents ☐ F001 Spent halogenated solvents Carbon Tetrachloride Methylene chloride used in degressing Tetrachiomethylene 1,1,1-Trichloroethane Trichloroethylene 1,1,2-Trichloro-1,2,2-trifluroethane Trichloromonofluoromethane ☐ F002 Spent halogentated solvents Chlorobenzene o-Dichlorobenzene Methylene chloride Tetrachloroethylene 1,1,1-Trichloroethane 1.1,2-Trichloroethane Trichloroethylene 1,1,2-Trichloro-1,2,2-trifluroethene F003 Spent non-halogenated solvents Acetone n-Butvi alcohol Cyclchexanone Ethyl acetate Ethyl Benzene Ethyl ether Methanol Methyl isobutyl ketone Xylene (total) ☐ F004 Spent non-halogenated solvents m-Cresol o-Cresol p-Cresol Cresol-mixed isomers(cresylic acid) Nitrobenzene ☐ F005 Spent non-halogenated solvents Senzene Carbon disulfide 2-Ethoxyethanol Isobutyl alcohol Methyl e
Pyridine Methyl ethyl katone 2-Nitropropane Toluene SECTION (3C) Listed EPA Waste Codes (Other) (list all waste codes other than "F" listed codes not addressed in SECTION (3) above); **EPA Waste EPA Wasta EPA Waste EPA Waste** Subcategory Codes Codes Subcategory Codes Subcategory Subcategory Codes SECTION (4) Hazardous Debris (If this box is checked, complete the Hezerdous Debris section below.) Hazardous Debris The definitions of "debrie" and "hazardous debrie" are in the 40 CFR 268.2, Per 268.45, hazardous debris must be treated for each "contaminant subject to treatment." To determine these, look up the waste code in 268.40 and list the regulated hazardous constituents for each code. (Check the box that applies) This shipment contains hazardous debris that will be treated to comply with the alternative treatment standards of 268.45 (e.g., macroencapsulation or abrasive blasting), This shipment contains hazardous debris that will be treated to meet the 268.40 treatment standards for the waste(s) contaminating the The contaminants subject to treatment for this debris are identified below: **EPA Waste Code** Contaminants Subject to treatment Subcategory Printed: DATE

## **BILL OF LADING**

24 HOUR LIMERGENCY RESPONSE # 800-424-9300

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DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)





## Land and Chemicals Division

□ No V □ Lette □ Infor □ Pre- □ State □ Retu	ce of Violation and Inspection Reportion Letter and Inspection Report of Acknowledgment remation Request Filing and Opportunity to Confers Notification of Enforcement Actions to Compliance ection Report	rt/Checklist
Facility Name: <u>Detrex C</u>	orporation.	
Facility Location: 12886 Ex	aton Ave	
City: Detroit	State: MI	
U.S. EPA ID# MID 091 60	05 972	
Assigned Staff P. Atkoci	unas	Phone: 6-7502

Name	Signature	Date
Paul Atkociunas Author	Paul Atta	1-21-09
Tamara Carnovsky Regional Counsel	Tlanorog	1-21-09
Paul Little Section Chief	Chille	1-21-09
Willie Harris Branch Chief	N/A	

### **Directions/Request for Clerical Support:**

After the Section Chief/Branch Chief signs this sheet and original letter:

- 1. Date stamp the cover letter;
- 2. Make four copies of the contents of this folder:

One copy for the assigned staff;

One copy for the section file;

One copy for the branch file; and

One copy for the official file.

- 3. Make any additional copies for cc's or bcc's.
- 4. Mail the original certified mail and distribute office copies and cc=s and bcc=s. Once the certified mail receipt is returned:
- 5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7<sup>th</sup> floor RCRA file room;
- 6. E-mail staff the date that the letter was received by facility.



#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

JAN 2 3 2009

REPLY TO THE ATTENTION OF:

LR-8J

### <u>CERTIFIED MAIL</u> RETURN RECEIPT REQUESTED

Mr. David Craig
Manager of Environmental and Safety Compliance
Detrex Corporation
24901 Northwestern Highway, Suite 410
Southfield, Michigan 48075

Re: Request for Information

EPA ID No.: MID 091 605 972

Dear Mr. Craig:

By this letter, the U.S. Environmental Protection Agency requests information under Section 3007 of the Resource Conservation Act (RCRA), as amended, 42 U.S.C. § 6927. Section 3007 authorizes the Administrator of the EPA to require you to submit certain information.

This request requires the Detrex Corporation (the facility or you) to submit certain information relating to the EPA compliance evaluation inspection conducted on August 12, 2008 at its facility located at 12886 Eaton Avenue, Detroit, Michigan. We are requiring this information to determine the facility's compliance status with Section 3002 and/or 3004 of RCRA, 42 U.S.C. § 6922, and the regulations set forth at 40 Code of Federal Regulations (CFR) §§ 260 through 268. The specific information needed is identified below pursuant to Section 3007 of RCRA. The enclosure specifies the information you must submit. You must submit this information within 30 calendar days of receiving this request to the United States Environmental Protection Agency, Attention: Paul Atkociunas, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

You may, under 40 CFR Part 2 Subpart B, assert a business confidentiality claim covering all or part of the information in the manner described in 40 CFR § 2.203(b). We will disclose the information covered by a business confidentiality claim only to extent and by means of the procedures at 40 CFR Part 2, B. You must make any request for confidentiality when you submit the information since any information not so identified may be made available to the public without further notice.



Detrex Corporation must submit all requested information under an authorized signature certifying that the information is true and complete to the best of the signatory's knowledge and belief. Should the signatory find, at any time after submitting the requested information, that any portion of the submitted information is false, misleading or incomplete, the signatory should notify us. Knowingly providing false information, in response to this request, may be actionable under 18 U.S.C. §§ 1001 and 1341. We may use the requested information in an administrative, civil or criminal action.

This request is not subject to the Paperwork Reduction Act, U.S.C. § 3501 <u>et seq.</u>, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

Failure to comply fully with this request for information may subject Detrex Corporation to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928.

You should direct questions about this request for information to Paul Atkociunas at (312) 886-7502.

Sincerely,

Paul Little, Chief RCRA Branch

Compliance Section 2

Paul Little

#### **Enclosure**

cc: Tim Sonnenberg, MDEQ, Southeast District Office John Craig, MDEQ

#### **REQUEST FOR INFORMATION**

**Instructions:** You must respond separately to each of the questions or requests in this attachment. Precede each answer with the number of the Request for Information to which it corresponds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds.

#### Requests

- 1. Identify all persons consulted in preparing the answers to this Request for Information. Provide the full name and title for each person identified.
- 2. Provide the contents of each of the eight containers located on the concrete pad north of Container Storage Area 11 observed during the EPA inspection on August 12, 2008.
- 3. For the contents of each of the eight containers identified in Request #2, provide the following:
  - a. The date the material was obtained, received and/or generated at the facility.
  - b. A description of the material in each container at the time of receipt.
  - c. True, accurate, and complete copies of all records including, but not limited to manifests, bills of lading, etc. that document receipt of the material to the facility.
  - d. True, accurate, and complete copies of all records including, but not limited to, any reports / laboratory data for physical and/or chemical analyses, that document the material in each container and all applicable hazardous waste numbers.
- 4. For the contents of each container identified in Request #2, state whether the facility used the material as product, received the material as wastes or generated the material as wastes.
- 5. For the contents of each container identified in Request #2, state whether the facility determined the materials to be waste as defined in Michigan Administrative Code (MAC) Rule 299.9202 [40 CFR § 261.2]. If the materials were determined to be wastes, explain in detail the facility's rationale for such a determination and the date of the determination.
- 6. For the contents of each container identified in Request #2, state whether the facility determined the materials to be hazardous waste as defined in MAC Rule 299.9203 [40 CFR § 261.3]. If the contents were hazardous waste, provide the facility's rationale for such a determination and the date of the determination.
- 7. Identify the contents of the container that was observed to be leaking on August 12, 2008. Please note that the container was labeled with the words 'Nitromethane -6'' -3.' Provide true, accurate, and complete copies of all documents that contain information responsive to this request.

- 8. For the contents of each container identified in Request #2, state whether the facility made arrangements to have the waste disposed of (incinerated, land disposed, etc.). Provide true, accurate, and complete copies of all documents that contain information responsive to this request, including, but not limited to, all hazardous waste manifests, bills of lading, etc., for shipments of each container from the facility.
- 9. Provide the following certification by a responsible corporate officer:

I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY **REGION 5** 77 W. JACKSON BOULEVARD CHICAGO, IL 60604

## COMPLIANCE EVALUATION INSPECTION REPORT

	<b>INSTALLATION NAME:</b>	<b>Detrex Corporation</b>
--	---------------------------	---------------------------

**EPA ID No.:** 

MID 091 605 972

**LOCATION ADDRESS:** 

12886 Eaton Avenue

Detroit, Michigan 48227

**NAICS CODE:** 

562112

**DATE OF INSPECTION: August 12, 2008** 

U.S. EPA INSPECTOR:

Paul Atkociunas

PREPARED BY:

Paul Atkociunas

Chemist

**ACCEPTED BY:** 

Paul Little

Chief, Compliance Section #2

## **PARTICIPANTS:**

U.S. EPA

Paul Atkociunas Chemist Land and Chemicals Division Casey McCausland
Operations Manager
Parts Cleaning Technologies, Inc.
12886 Eaton Avenue

Detroit, Michigan 48227

77 W Jackson Boulevard, LR-8J

Chicago, Illinois 60604

David Craig
Manager of Environmental and Safety Compliance
Detrex Corporation
24901 Northwestern Highway, Suite 410
Southfield, Michigan 48075

### **PURPOSE OF INSPECTION:**

The purpose of the inspection was to conduct a Compliance Evaluation Inspection (CEI) at the Detrex Corporation facility located at 12886 Eaton Avenue, Detroit, Michigan. The inspection was conducted by the EPA to determine the facility's compliance under the Resource Conservation and Recovery Act (RCRA), the State of Michigan Hazardous Waste Management Facility Operating License, and the U.S. EPA RCRA Permit.

August 12, 2008

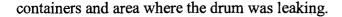
### **INTRODUCTION:**

EPA representative Paul Atkociunas arrived at the facility and introduced himself. The inspector was greeted by Casey McCausland, Operations Manager. Inspector Atkociunas presented his federal enforcement credentials and explained the nature, scope and procedures of the inspection.

### **INSTALLATION DESCRIPTION:**

Detrex is a licensed / permitted storage facility. The facility is permitted to store no more than a total volume of 13, 750 gallons of hazardous wastes in containers. Detrex may store containers in five permitted areas, Areas 7, 8, 9, 11, and 29 (See Attachment 1: Facility Layout) for up to 1-year. Mr. McCausland provided the inspector with a brief overview of operations. Mr. McCausland stated that the facility stores hazardous waste and universal waste; bulks non-hazardous waste (latex paint); and acts as a transfer facility for used oil. Mr. McCausland stated that personnel at the facility are employed by Parts Cleaning Technologies, Inc., however Detrex Corporation remains the owner and operator of the location. He stated that Parts Cleaning Technologies, Inc. transports hazardous waste to / from the facility. Mr. McCausland stated that





### **RECORDS REVIEW:**

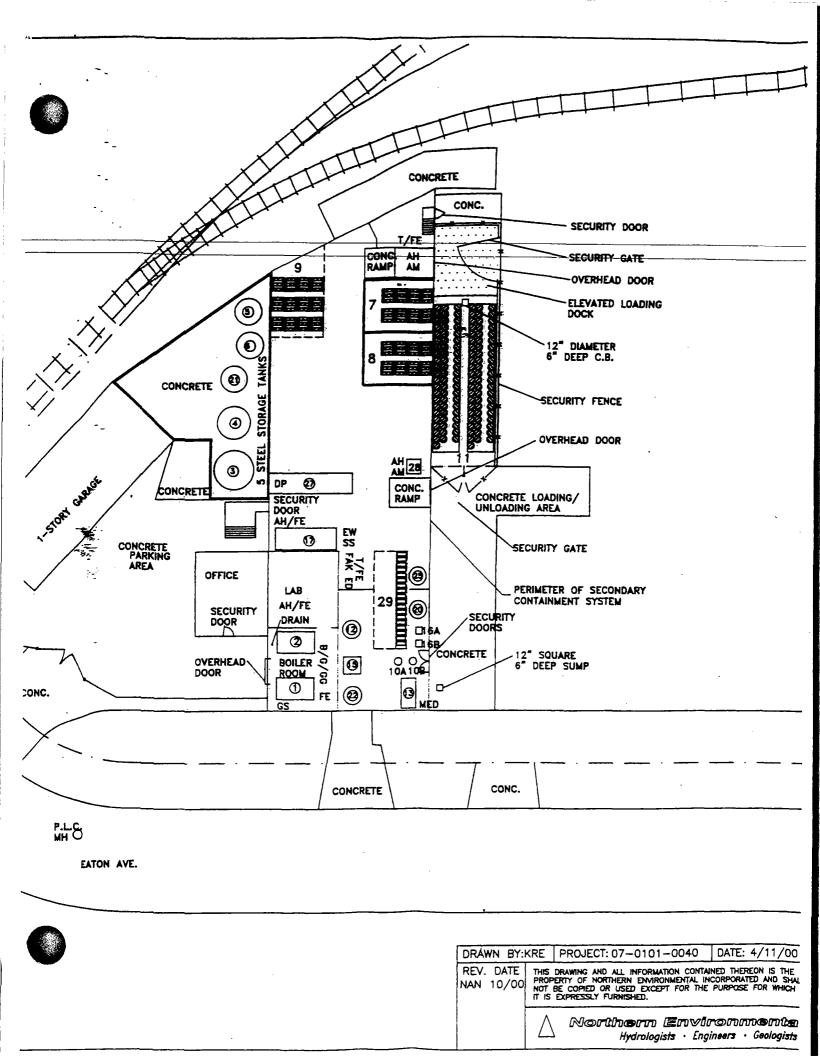
Inspector Atkociunas reviewed manifests, land disposal restrictions, and waste profiles. No concerns were noted. Inspector Atkociunas asked Mr. Craig about the relationship between Detrex Corporation and Parts Cleaning Technologies, Inc. Mr. Craig stated that Detrex Corporation remains the owner / operator of the facility and Parts Cleaning Technologies conducts the day-to-day operations at the facility.

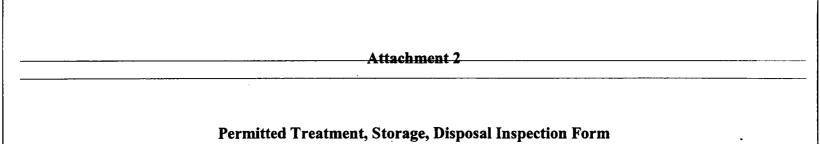
## **CLOSING CONFERENCE:**

The inspector conducted a closing conference with Mr. Craig; the inspector informed him that the inspection was a random compliance evaluation inspection to determine the facility's compliance with RCRA, their MDEQ Operating License and their EPA Hazardous Waste Storage Permit. Inspector Atkociunas stated that the facility will receive written correspondence from the EPA on the inspection. Inspector Atkociunas expressed concern on the drum that was observed leaking and the remainder of the drums that were located outside, adjacent to the storage trailers.

## **ATTACHMENTS**:

Attachment 1	Facility Layout
Attachment 2	Permitted Treatment, Storage, Disposal Inspection Form
Attachment 3	TSDF Generator Appendix Inspection Form
Attachment 4	Used Oil Inspection Form
Attachment 5	Universal Waste Small Quantity Handler Inspection Form
Attachment 6	Inspection Checklist for Subpart CC: Air Emission Standards
Attachment 7	Photograph Log







# Department of Environmental Quality, Waste and Hazardous Materials Division PERMITTED TREATMENT, STORAGE, DISPOSAL INSPECTION FORM

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ENVIRONMENTAL & HUMAN HEALTH STANDARDS GENERALLY (Rule 602)		YES	NO ·
Is the TSDF operated in a manner that will prevent the following: (Rule 602)			
a) violations of Federal Clean Water Act or Act 451, Part 31? (Rule 602(1)(a)	DPB	[7:1	NI N/A
b) air emissions in violation of the Federal Clean Air Act or Act 451, Part 55? (Rule 602(1)(b))	DPB	ואָז	NI N/A
c) degradation, as defined in Act 451, Part 31, of a sole-source aquifer? (Rule 602(1)(c))	DPB	ַולו	NI N/A
d) exposure of humans/environment to harmful quantities of hazardous waste/constituents? (Rule 602(1)(d))	DPB	ιŽι	NI N/A
e) pollution, impairment or destruction of natural resources of the state? (Rule 602(1)(e))	DPB	٦٢٦	NI N/A
GENERAL FACILITY STANDARDS (Rule 605: 40 CFR 264.11 & 264.12)			
2. Does the facility have an EPA ID#? (40 CFR 264.11)	DGS	X	NI N/A
3. If required, have the following been notified:			
a) Director of receipt of hazardous waste from foreign source (minimum 4 wks in advance)? (40 CFR 264.12(a))	DGS	1.1	NI N(IA)
b) generator that the TSDF has permit(s) & will accept waste (copy of letters in operating record): (40 CFR 264.12(b))	DGS	11	NI M
c) the new owner/operator, in writing, of the requirements. (40 CFR 264.12(c)).	DGS		NI 🐼
4. Has facility developed a procedure on vehicles & containers either being empty or having manifest? (Rule 605(2))	DGS	ιXı	NI N/A
5. Has the owner/operator, w/ regard to transport vehicles & other containers leaving the facility that are not empty either:			
a) taken all steps in procedure (see question #4) to insure provisions of R299.0207 are met? (Rule 605(2)).	DGS		NI (VA
b) is waste remaining in vehicle or container accompanied by manifest? (Rule 605(2)).	DGS	ľXi	NI N/A
	<u> </u>		NI N/A
GENERAL WASTE ANALYSIS (Rule 605: 40 CFR 264.13)			<del></del>
6. With regard to the waste:			
a) has owner/operator obtained a detailed chemical and physical analysis of the waste? (40 CFR 264.13(a)(1))	DGS	<u>-</u> IÀL.	Ni N/A
b) analysis repeated for accuracy when process change or fingerprints don't match? (40 CFR 264.13 (a)(3)(i-ii))	DGS		NI N/A
c) is waste received from off-site inspected/analyzed to determine if it matches the manifest? (40 CFR 264.13(a)(4))	DGS	<u>IX</u> L	NI N/A
7. Does the owner/operator have a detailed waste analysis plan on file at the facility? Does it include:	DGS		NI N/A
a) the parameters to analyze waste & rationale for selecting these parameters? (40 CFR 264.13(b)(1))	DGS	ΙXI.	NI N/A
b) test & sampling methods used to obtain representative samples? (40 CFR 264.13(b)(2&3))	DGS	K/T	NI N/A
c) frequency of which initial analysis will be reviewed or repeated? (40 CFR 264.13(b)(4))	DGS	<u>[X]                                    </u>	NI N/A
d) off-site waste analysis from generator & any other additional analysis required? (40 CFR 264.13(b)(5&6))	DGS	Ŋ.	NI N/A
e) for surface impoundments, exempt from land disposal restrictions under 268.4(a), the following:	<del></del>		
i) sampling of impoundments? (40 CFR 264.13(b)(7)(i)	DGS	•	NI N/A
ii) analysis of test data and annual removal of residues? (40 CFR 264.13(b)(7)(ii&iii)(A)(B)(1-2)	DGS	141	NI N/A
8. Does facility have procedures to inspect/analyze off-site waste for match w/ manifest in waste analysis plan, specifically:		-/	
a) to determine identity of each waste movement at facility? (40 CFR 264.13(c)(1))	DGS	1,	NI N/A
b) sampling method used to obtain representative sample, if I.D. method includes samples? (40 CFR 264.13(c)(2))	DGS	₩.	NI N/A
<ul> <li>c) procedures owner/operator of off-site landfill receiving containerized hazardous waste will use to determine whether generator or treater has added a biodegradable sorbent to the container? (40 CFR 264.13(c)(3)</li> </ul>	DGS	r⁄a_	NI N/A
GENERAL INSPECTION REQUIREMENTS (Rule 605: 40 CFR 264.15)		•	
9. Facility inspected for malfunctions/deterioration/operator errors/discharges of hazardous waste that may affect			
human health or the environment? (40 CFR 264.15(a))	DGS	M-	NI N/A
10. Owner/operator has a written inspection schedule kept at facility? And inspect for: (40 CFR 264.15(b)(1&2))	DGS	K1	NI N/A
a) monitoring equipment? (40 CFR 264.15 (b)(1))	DGS	1×1	NI N/A
b) safety & emergency equipment? (40 CFR 264.15 (b)(1))	DGS	íχi-	NI N/A
c) security devices? (40 CFR 264.15 (b)(1))	DGS	[/]_	NI N/A
d) operating and structural equipment (i.e.: dikes, pumps, etc.)? (40 CFR 264.15 (b)(1))	DGS	沐	NI N/A
e) types of problems to be looked for (i.e.: leaky fittings, eroding, dike, etc.)? (40 CFR 264.15 (b)(3))	DGS	[X]	NI N/A
f) inspection frequency based on: (40 CFR 264.15(b)(4))		.V-	
i) possible deterioration rate of equipment?	DGS	<u> [X]                                    </u>	NI N/A
ii) areas subject to spills daily (such as loading and unloading areas)?	DGS   EQP5166	[1 <b>/</b> ] 6 (Rev 4	NI N/A 1/03) Page 2

		YES NO	<u> </u>
11. Does the log contain: (40 CFR 264.15 (b)(2)& (d))			
a) date and time of inspection?	DGS	ιχι -	NI N/A
b) name of the inspector?	DGS	[ <del>×</del> 1_	NI N/A
c) notation of observations made?	DGS	ΙΆΙ	NI N/A
d) date and nature of repairs or other remedial actions?	DGS	[7]	NI N/A
e) records of inspections kept at least 3 years in inspection log at facility?  12. Were malfunctions/deterioration of equipment or structures remedied on schedule to ensure that problem did not lead to an environmental or human health hazard? And where a hazard is imminent or already occurred was remedial action taken immediately? (40 CFR 264.15(c))	DGS DGS	- ί <sup>ζ</sup> ι - [χ <sub>1</sub>	NLN/A
PERSONNEL TRAINING (Rule 605: 40 CFR 264.16)			
13. Do personnel training records contain the following:			
a) job title? (40 CFR 264.16(d)(1))	DGS	[1/2]	NI N/A
	DGS	[7]	NI N/A
c): name of employee filling jobs? (40 CFR 264.16(d)(1))	DGS		NI N/A
d) descriptions of type & amount of both introductory and continued training? (40 CFR 264.16(d)(3))	DGS	(,	NI N/A
e) training designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, emergency systems & hazardous waste management		رلاً _	NI N/A
f) records of training? (40 CFR 264.16(d)(4))	DG <u>S</u>	[X]	NI N/A
g) new personnel receive required training w/in 6 months & do not work unauthorized until trained?(40 CFR 264.16(b))	DGS	_ ואַז	NI N/A
h) personnel training records show personnel have taken part in annual review of initial training? (40 CFR 264.16(c))	DGS	[X] -	NI N/A
i) program conducted by someone trained in hazardous waste management? (40 CFR 264.16(a)(2))	DGS	1×1	NI N/A
j) records kept until closure or 3 years after employee worked at facility? (40 CFR 264.16(e))	DGS	[X]_	NI N/A
GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE OR INCOMPATIBLE WASTE (Rule 605:	40 CI	FR 264.	17)
14. If required, are the following taken:			
	DGS	<u> </u>	NI N/A
	DGS	(X)	NI N/A
c) are actions taken in "b" documented? (40 CFR 264.17(c)).	DGS		NI N/A
CONTINGENCY PLAN AND EMERGENCY PROCEDURES (Rule 607: 40 CFR 264.50)  Rule 607 refers to 40 CFR Part 264, Subpart D, 264.50-264.56			
15. Was the contingency plan & notification immediately implemented whenever a fire, explosion or release of hazardous waste could threaten human health or the environment? (Rule 607(2): 40 CFR 264.51(b))	DCP	[]_	NI (N/A
16. Does the contingency plan contain the following information:			
	DCP	W_	NI N/A
b) describe arrangements or attempts to make arrangements agreed to by local police/fire/hospitals/contractors & state & local emergency response teams to coordinate emergency services? (40 CFR 264.52(c)) & (40 CFR 264.37 (c))	DCP	<u>IX1</u> _	NI N/A
c) if local authorities decline to enter into such agreements is the refusal documented? (40 CFR 264.37(b))	DCP	<u> </u>	NI N/A
d) names, addresses & phone numbers (office and home) of all emergency coordinators? (40 CFR 264.52(d))	DCP	<u> </u>	Ni N/A
e) list of emergency equipment which includes location, physical description & capabilities? (40 CFR 264.52 e))	DCP	171_	NI N/A
f) evacuation plan for personnel giving signals(s), evacuation routes & alternate evacuation routes?( 40 CFR 264.52(f))	DCP	[]	NI N/A
17. Emergency Coordinator and Emergency Procedures:	<del></del>		
a) Is coordinator(s) familiar w/ all aspects of site operation & emergency procedures (including location of records)?  (40 CFR 264.55)	DCP	$\mathcal{C}_{1}$	_ NI N/A
	DCP	N.	NI N/A

c) If an emergency situation occurred, did the coordinator(s) follow the emergency procedures? (40 CFR 264.56)

d) Is the emergency coordinator either on-site or on-call at all times? (40 CFR 264.55))

NI (N)A

DCP

DCP [A] NI N/A EQP5166 (Rev 4/03) Page 3

		YES	NO	
18. Plan amendments and copies:				
<ul> <li>a) Amended for changes in regulations/facility operations/emergency coordinators/emergency equipment, or if plan failed in emergency? (40 CFR 264.54)</li> </ul>	DCP	[X]	<u></u>	NI N/A
b) Are copies of the contingency plan available on-site and at local emergency organizations? (40 CFR 264.53)	DCP	[\( \)		NI N/A
USE OF MANIFESTS (Rule 608: 40 CFR 264.71 & 264.72)				
19. If the facility receives hazardous waste accompanied by a manifest, does it complete the following:				
a) signs & dates each copy? (Rule 608(1)(a): 40 CFR 264.71(a)(1))	DMR	ואו		NI N/A
b) notes any significant discrepancies in quantity & type? (Rule 608(1)(b) & (5): 40 CFR 264.71(a)(1) & 264.72)).	DMR	[1/2]		NI N/A
c) Immediately gives the transporter one signed copy of the manifest? (Rule 608 (1)(c): 40 CFR 264.71 (a)(3))	DMR	[X]		NI N/
d) copy sent to generator w/in 30 days & MDEQ w/in 10 days after end of month the waste was received? (Rule 608(1)(d&f): 40 CFR 264.71(a)(4))	DMR	r×1		JI M//
e) retains copy on-site for three years from date of delivery? (Rule 608(1)(e): 40 CFR 264.71(a)(5))	DMR	_		<u>VI N/A</u> VI N/A
20. Complies w/ requirement for bulk shipments of hazardous waste by rail/water? (Rule 608(2): 40 CFR 264.71(b))	DMR	מו		vi (17)
21. Notifies Director if significant discrepancy isn't corrected w/ generator w/in 15 days? (Rule 608(4): 40 CFR 264.72))	DMR	ιXı		NI N/A
21. Notifies Director if significant discrepancy fart corrected w/ generator w/m 13 days? (Rule 505(4), 40 CFR 204.72))	DIVIN			II (N/F
RECORDKEEPING (Rule 609: 40 CFR 264.73 & 264.74)				
OTE: Rule 609(1)(a) refers to 40 CFR 264.73 and 40 CFR Part 264, Appendix I				
22. Does the owner/operator maintain an operating record on-site with the following information recorded:	DMR	K)		11. 11/4
a) records & results of inspections in 264.15 (kept 3 years). (Rule 609(1)(e): 40 CFR 264.73(b)(5))	DMK	11/1		N/A
DTE: Rest of records must be kept until closure (40 CFR 264.73(b)(5)).				
<ul> <li>b) description/quantity of waste received, method &amp; date of treatment/storage disposal? (Rule 609(1)(a): 40 CFR 264.73(b)(1)) &amp; Appendix I in Part 264</li> </ul>	DMR	ı×ı		II N/A
c) location/quantity of waste in facility (cross-referenced to manifest #) on a map? (40 CFR 264.73 (b)(2))	DMR	LX1		() N/A
d) records/results of waste analysis/trial test/monitoring data/inspections? (40 CFR 264.73(b)(3))	DMR	1/1	•	II N/A
e) reports on incidents that required implementation of the Contingency Plan? (40 CFR 264.73(b)(4))	DMR	[X]		ii N/A
f) monitoring, testing or analytical when required? (40 CFR 264.73(b)(6))	DMR	K1		II NIA
g) notices to generator. (40 CFR 264.73(b)(7)).	DMR	[1/]		II N/A
h) closure and post-closure cost estimates? (40 CFR 264.73(b)(8))	DMR	1.21		I N/A
i) annual certification by permittee that program is in place to reduce the volume/toxicity of haz waste generated & activities on-site used to minimize threat to human health & environment? (40 CFR 264.73(b)(9))	DMR	1/1		H N/A
j) quantity/date of placement in land disposal unit of waste w/ extension to the land disposal restriction?		, ,		
(40 CFR 264.73(b)(10))	DMR	~:		I (W)
k) off-site treatment, copy of generator's notice or certification/demonstration? (40 CFR 264.73(b)(11))	DMR	1×1		II N/A
l) on-site treatment, notice data (not manifest #) or certification/demonstration? (40 CFR 264.73(b)(12))	DMR	[*]	N	
m) off-site land disposal, copy of generator's notice or certification/demonstration? (40 CFR 264.73(b)(13))	DMR	ιXı		<u>N/A</u> اا
n) on-site land disposal, notice data (not manifest #) or certification/demonstration? (40 CFR 264.73(b)(14))	DMR			II (VIA
o) off-site storage, copy of notice or certification/demonstration from generator? (40 CFR 264.73(b)(15))	DMR	Ķ		II N/A
p) on-site storage, notice information (not manifest #) or certification/demonstration? (40 CFR 264.73(b)(16))	DMR	1/7		I N/A
q) any other records required to be kept by the operating license? (Rule 609 (1)(b))	DMR	17		II N/A
3. Are all required records maintained and available for inspection? (Rule 609(2 & 3): 40 CFR 264.74(a))	DMR	ľΧΊ	N	II N/A
REPORTING (Rule 610: 40 CFR 264.75-264.77)				
4. Submitted a biennial report to RA by March 1 of even years (IC, GM, WR, PS, OI)? (Rule 610(1): 40 CFR 265.75))	DMR	Kı	N	I N/A
5. If hazardous waste is received from off-site, has: (Rule 610(2): 40 CFR 264.76)				
a) the facility accepted any waste without a manifest or shipping paper?	DMR		ľХ	II N/A
b) if "a" is yes, was the Director provided with "Unmanifested Waste Report" within 15 days?	DMR		N	II N/A
6. Owner/operator of haz waste disposal/treatment unit on the site of generation submitted monthly report. (Rule 610(3)	) DMR	r ı	N.	II NIA

CLOSURE AND POST-CLOSURE (Rule 613: 40 CFR Subpart G)	YE	S NO	<u>)</u>
27. Do certain surface impoundment/waste piles have contingent closure plans? (Rule 613(1): 40 CFR 264.112(a& b))	DCL	[ ]	NI (VA)
28. Does the facility have a written closure plan & does the plan identify: (40 CFR 264.112)	DCL	[X]	Ni N/A
a) how each hazardous waste unit will be closed in accordance w/ 264.111? (40 CFR 264.112 (b)(1))	DCL	[X]	NI N/A
b) maximum extent unclose during the facility life w/ description of final closure? (40 CFR 264.112(b)(2))	DCL	[4]	NI N/A
c) maximum inventory of all waste on-site? (40 CFR 264.112 (b)(3))	DCL	[4]	NI N/A
d) description of steps to remove or decontaminate equipment, soils, etc.? (40 CFR 264.112(b)(4))	DCL	L/J	NI N/A
e) description of other closure activities to satisfy closure performance standards? (40 CFR 264.112(b)(5))	DCL	1/1	NI N/A
f) schedule w/ time of closure activities for each hazardous waste management unit? (40 CFR 264.112(b)(6))	DCL	1 X 1	NI N/A
g) a written closure cost estimate available and cost adjusted for inflation? (40 CFR 264.142(a&b))	DCL	X	NI N/A
29. Did the facility begin partial or final closure of any or all hazardous waste management units w/out notifying the Direct		1/1	NI N/A
more than 60 days in advance? (Rule 613(2))	DCL	L	[X] NI N/A
Note: Disposal facilities need post-closure + Pth Pelm IT - No Post- Closure Plan	1 0-0	or RE	- 0
Note: Disposal facilities need post-closure + YER   FRM IT - NO   POST - CLOSURE   YLA \( \)  30. Do certain surface impoundment/waste piles have POST-closure plans? (Rule 613(1): 40 CFR 264.118(a&c))		ORRE	-/
	DCL	_ <del></del>	NI N/A
31. Does the facility have a written post-closure plan? Does the plan identify: (Rule 613.(1): 40 CFR 264.118(a&c))	DCL		<u> </u>
a) description of the planned monitoring activities (i.e., waste piles etc.)? (40 CFR 264.118(b)(1))	DCL		✓ NI N/A
b) description of maintenance activities and frequencies for: (40 CFR 264.118(b)(2))	DCL		<u>≺</u> NI N/A
i) integrity of cap/final cover or other containment systems? (40 CFR 264.118(c)(2)(i))	DCL		_∠ NI N/A
ii) monitoring equipment? (40 CFR 264.118(b)(2)(ii))	DCL	[]	X NI N/A
c) Name/address/phone# of person or office to contact during post-closure care period? (40 CFR 264.118(b)(3))	DCL		X NI N/A
d) A written post-closure cost estimate & cost was adjusted for inflation? (40 CFR 264.142(a) & (b))	DCL	11	X NI N/A
32. If changes to approved closure/post-closure plan were made, did the owner/operator first submit a written request to make said changes? (40 CFR 264.112(c) & 264.118(d))	DCL	[]	<u>≭ Ni N/A</u>
FACILITY DESIGN & OPERATING STANDARDS (Rule 604)			
33. If applicable, are the following maintained at the TSDF:	DPB	[X]	NI N/A
a) a run-on control system for a 24 hour, 25 year storm? (Rule 604(1)(a))	DPB		NI (N/A)
b) a run-off management system for a 24 hour, 25 year storm? (Rule 604(1)(b))	DPB	[X]	NI N/A
c) systems to prevent hazardous waste/constituents from escaping. (Rule 604(1)(c))	DPB	[1/]	NI N/A
ENVIRONMENTAL MONITORING (Rule 611)			
34. If applicable, has the TSDF carried out their environmental monitoring program? (Rule 611)	DMR	[]	NI NA
RELEASES FROM SOLID WASTE MANAGEMENT UNITS (40 CFR 264, SUBPART	F)		
35. Did owner/operators comply with 264.101 for all solid waste management units? (40 CFR 264.90(a)(2))	DSW	1_1	NI (VA)
36. Facilities w/ surface impoundments/waste piles/land treatment units receiving waste after 7-26-82 comply w/ 264.91	DOW		Ka
thru 264.100 in lieu of 264.101 for releases to upper-most aquifer (see exceptions). (40 CFR 264.90(a)(2)&(b))	DSW	<del>-</del>	NI (VA)
37. Did the owner/operator subject to this subpart conduct a monitoring/response program as specified in 264.91?	DSW		NI N/A
38. Did the owner/operator comply w/ specifics in the permit (EPA-HSWA permit)? (40 CFR 264.92-264.101)	DSW		NI N(A)
PREPAREDNESS AND PREVENTION (Rule 606: 40 CFR 264.30)  Note: Rule 606 refers to 40 CFR, Subpart C, 264.34-264.37			
39. Is the facility maintained and operated to minimize the possibility of fire, explosion, or release of hazardous waste or hazardous waste constituent? (40 CFR 264.31)	DPP	Co. sai	idObsvd NI N/A
40. If required, does this facility have the following equipment?			
a) internal communications or alarm systems that can provide immediate emergency instruction? (40 CFR 264.32(a)	DPP	ιχı	NI N/A
b) telephone or 2-way radios at the scene of operations? (40 CFR 264.32(b))	DPP	įΚį	NI N/A
c) portable fire extinguishers, fire control, spill control equipment & decontamination equipment? (40 CFR 264.32(c)	DPP	KI	NI N/A
d) adequate volume of water and/or foam available for fire control? (40 CFR 264.32(d))	DPP	N)	NI N/A
41. Testing and Maintenance of Emergency Equipment:	L		
a) does the owner/operator test & maintain emergency equipment to assure proper operation? (40 CFR 264.33)	DPP	ιXı	NI N/A
(1. of 1. 20 1.00)			4/03) Page 5

YES NO

b) Does owner/operator provide immediate access to internal alarms & communication devices when: (40 CFR 264.3	4 (a&b)	 )	
i) hazardous waste is being poured, mixed, etc.	DPP	141	NI N/A
ii) only one employee on the premises while facility is operating?	DPP	[7]	NI N/A
c) Adequate aisle space in facility for unobstructed movement of personnel/emergency equipment? (40 CFR 265.35)	DPP	[X]	NI N/A

SECURITY (40 CER 264 14)	
43. Is unknowing entry prevented into active portion (unless demonstrated to Director that the physical contact by:	:t/disturbance will not cause violation)
a) 24-hour surveillance (40 CFR 264.14(b)(1))	DGS [X _ NI N/A
b) artificial or natural barrier & controlled entry. (40 CFR 264.14(b)(2)(i & ii)).	DGS [1/2] NI N/A
c) danger sign(s) legible from at least 25 feet at entrance (40 CFR 264.14(c))	DGS [74] NI N/A

# USE/MANAGEMENT OF CONTAINERS IN STORAGE (Rule 614: 40 CFR Subpart I) NOTE: Rule 614 refers to 40 CFR, Subpart I, 264.170-264.176

OIE: Rule 614 refers to 40 CFR, Subpart I, 204.170-204.176					
44. Is each container labeled or marked clearly:					
a) with the words "Hazardous Waste"? (Rule 614(1)(b))	DGS	ш	×	NI N	<u>I/A</u>
b) with the hazardous waste number? (Rule 614.(1)(b))	DGS	1	X	NI N	ľΑ
45. Are containers:					
a) in good condition? (40 CFR 264.171)	DGS	ш	X	NI N	I/A
b) if no, did owner transfer waste or otherwise comply? (40 CFR 264.171)	DGS	IXI		NI N	l/A
c) compatible with waste in them? (40 CFR 264.172)	DGS	L		NI (N	ľΑ
d) stored closed when not in use? (40 CFR 264.173(a))	DGS	11		NI Q	ľΑ
e) managed to prevent leaks? (40 CFR 264.173(b))	DGS		X	NI N	ľΑ
46. Are containers & storage area inspected weekly for leaks and defects? (40 CFR 264.174)	DGS	X		NI N	/A
47. Container storage areas have containment designed/operated as follows if waste contains free liquids or F020, F021	, F022, F0	)23, F	026, F	027:	
a) impervious base free of cracks? (40 CFR 264.175(b)(1))	DGS	ιχı		NI N	/A
b) sloped or designed to elevate/protect containers from contact w/ accumulated liquids? (40 CFR 264.175(b)(2))	DGS	ιχι		NI N	/A
c) containment can hold 10% of volume of containers/largest container, whichever is greater?(40 CFR 264.175(b)(3)	) DGS	[X]	_	NI N	/A
d) run-on prevented unless capacity in excess? (40 CFR 264.175(b0(4))	DGS	ιχı		NI N	ΙA
<ul> <li>e) accumulated liquids (waste/precipitation) removed in a timely manner to prevent overflow? (40 CFR 264.175(b)(5))</li> </ul>	DGS	[]		NI K	B
<ol> <li>If stored hazardous waste is solid or F020, F021, F022, F023, F026, F027, is the storage area sloped or otherwise designed, or containers elevated or otherwise protected from contact with liquids? (40 CFR 264.175(c))</li> </ol>	DGS	Ll		NI K	À
<ol> <li>Are ignitable and reactive wastes stored at least 15 meters (50 feet) from property line? (Indicate if waste is ignitable reactive.) (40 CFR 264.176)</li> </ol>	or DGS	Z		NI N	
50. Are incompatible wastes stored in separate containers? (If not, (40 CFR 264.17(b)) applies.) (40 CFR 264.177(a))	DGS	7		NI N	/Α
51. Are hazardous wastes placed in containers that previously held incompatible material? (40 CFR 264.177(b))	DGS		13/4	NI_N	/A
<ol> <li>Incompatible waste separated/protected from each other by physical barriers or sufficient distance?</li> <li>(40 CFR 265.177 (c))</li> </ol>	DGS	23		N/A	•

51. Are hazardous wastes placed in containers that previously held incompatible material? (40 CFR 264.177(b))	DGS		NI N/A
52. Incompatible waste separated/protected from each other by physical barriers or sufficient distance? (40 CFR 265.177 (c))	DGS	120	NI N/A
COMMENTS:			
Note: EIGHT 55-gallin downs observed	<b>,</b>		
or dock north of permitted area 11.			
ONE DEUM OBSERVED LEAKING. Additional into	12901	iled	/
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# Attachment 3

**TSDF Generator Appendix Inspection Form** 

# DEQ

(40 CFR 268.9(b))

# Department of Environmental Quality, Waste and Hazardous Materials Division TSDF GENERATOR APPENDIX INSPECTION FORM

ords for r inspec	the	Part 3 Rulè
		<u> </u>
	YES N	0
GRR	<u> </u>	NI N/A
GMR	ιχι_	NI N/A
GMR	ואו	NI N/A
GMR	ıΣı	NI N/A
GMR	[X]	NI N/A
GMR	(X)_	NI N/A
GMR	[ <u>V</u> ]	NI N/A
GMR	[X]	NI N/A
GMR	[X]_	NI N/A
GMR	[X]_	NI N/A
GMR	( <u>X</u> )	NI N/A
	1.1.	
	<del>-                                    </del>	
0		
GRR	<b>M</b>	NI N/A
GRR		NI N/A
GRR	<u>rVı</u>	NI N/A
GGR	Ц_	NI N/A
GRR	<u>.                                    </u>	NI N/A
GGR	<u></u>	Nì N/A
GLB	141	NI N/A
GLB	<u>K</u> _	NI N/A
GLB	<u>Z</u>	NI N/A
	GMR	GMR IXI — GMR IX

If restricted waste exceeds treatment standards/prohibitions does notice go w/ each shipment, when required? (40 CFR268.7(a)(1))

GLB NI N/A
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OR		YES N	10	
<ul> <li>If restricted waste does not exceed treatment standards/prohibitions does notice and certification statement go w/ each shipment, when required? (40 CFR 268.7(a)(3))</li> </ul>	h GLB		NI MA	
OR				
<ol> <li>If waste has exemption from prohibition on type of land disposal method utilized for waste, does notice go w/ each shipment, when required? (40 CFR 268.7(a)(7))</li> </ol>	GLB		NI,XTA	
OR			O	
0. If facility chooses alternative treatment standard for lab pack that contains none of the waste in appendix IV, does not				$\Box$
and certification go w/ each shipment, when required? (40 CFR 268.7(a)(9))	GLB		NI (N)	+
11. Does the notice include: (40 CFR 268.7(a)(1)(I-v) or 268.7(a)(2)(i)(A-D) or 268.7(a)(3)(i-iv)	<del></del>	Γ	<del></del>	$\dashv$
a) EPA hazardous waste #?	GLB	[X] _	NI N/A	$\dashv$
b) if wastewater or non-wastewater as defined in 268.2(d&f)?	GLB	ַנאַן	NI N/A	+
c) subcategory of the waste (such as D003 reactive cyanide) if applicable?	GLB	IXI _	NI N/A	$\dashv$
d) manifest number associated with the shipment?	GLB	[X]_	NI N/A	$\dashv$
<ul><li>e) waste analysis data, where available?</li><li>f) waste constituents that treater will monitor, if monitoring will not include all regulated constituents, for F001 - F005,</li></ul>	GLB	[]	NI N/A	$\dashv$
F039, D001, D002, D012-D043? (treatment standards for hazardous waste in table in 268.40 for waste code under regulated constituents)		四_	NI N/A	
UNLESS				
g) Does generator/treater claim they are going to monitor for ALL regulated constituents in waste in lieu of generator indicating same in the notice? (40 CFR 268.7(a)(1)(ii), 268.7(a)(2)(I)(B) & 268.7(a)(3)(ii))	GLB	[ 1 <del>\</del>	NI N/A	7
h) underlying hazardous waste constituents (except vanadium and zinc), to reasonably expected to be present at generation point, above UTS standards for D001, D002 & TCLP organics? (40 CFR 268 Subpart D & 268.48)	GLB	<u> </u>	NI N/A	1
Other than notices for waste exceeding treatment standards, do notices include:				7
a) certification if notice is for shipments that meet the standards? (40 CFR 268.7(a)(2)(ii))	GLB	N	NI N/A	]
<ul> <li>b) statement that the waste isn't prohibited from land disposal &amp; date waste is subject to prohibition if notice is for shipments under prohibitions? (40 CFR 268.7(a)(3) &amp; 268.7(a)(3)(vii))</li> </ul>	GLB	ĽΔ	NI N/A	
3. Does facility test their waste according to frequency specified in their waste analysis plan? (40 CFR 268.7(b))	GLB	<u> </u>	NI N/A	
4. Are tests on waste(s) performed as follows: (40 CFR 268.7(b))		·		
<ul> <li>a) for wastes w/ treatment standards as concentrations in waste extract, does facility test treatment residues or extract of residues using specified test method to meet applicable treatment standards? (40 CFR 268.7(b)(1))</li> </ul>	GLB		NI(N/A)	ͺͺͺ
<ul> <li>b) for wastes prohibited under §268.32 &amp; not subject to treatment standards, does facility test treatment residues according to generator testing requirements to make sure waste meets prohibition? (40 CFR 268.7(b)(2))</li> </ul>	GLB		NI(N)A	/
<ul> <li>c) for wastes w/ treatment standards as concentration in waste, does facility test treatment residues (not extract) to assure residues meet applicable treatment standards (40 CFR 268.7(b)(3))</li> </ul>	GLB		N(N/A)	
5. Is notice sent w/ each waste shipment to the land disposal facility? (see exemption for debris) (268.7(b)(4))	GLB		NI (VA)	
6. Is the following information included in the notice: (40 CFR 268.7(b)(4))				
a) EPA Hazardous Waste Number? (40 CFR 268.7(b)(4)(i))	GLB	[X] _	NI N/A	
b) waste constituents that treater will monitor, if monitoring will not include all regulated constituents, for F001 - F005, F039, D001, D002, D012-D043? (40 CFR 268.7(b)(4)(ii))	GLB	<u>(X) _</u>	NI N/A	
c) whether waste is non-wastewater or wastewater? (40 CFR 268.7(b)(4)(ii))	GLB	<u>凶_</u>	NI N/A	
d) subcategory of waste (such as D003 reactive cyanide), if applicable? (40 CFR 268.7(b)(4)(ii))	GLB	<u> [Ž]</u>	NI N/A	
e) manifest number associated with shipment? (40 CFR 268.7(b)(4)(iii))	GLB	五	NI N/A	
f) waste analysis data, where available? (40 CFR 268.7(b)(4)(iv))	GLB	K1_	NI N/A	
<ol> <li>Treatment facility submit certification w/ each shipment of waste or treatment residue of restricted waste to land dispos facility stating waste/residue has been treated in compliance w/ standards (except for debris)? (40 CFR268.7(b)(5))</li> </ol>	sal GLB	<u> </u>	NI (N/A)	
<ul> <li>a) For wastes w/ treatment standards expressed as concentration in waste extract, or for prohibited wastes, is specific certification signed by an authorized representative? (40 CFR 268.7(b)(5)(i))</li> </ul>	ed GLB	ட_	NI NIA	
b) For wastes w/ treatment standards expressed as technologies is specified certification signed by an authorized representative? (40 CFR 268.7(b)(5)(ii))	GLB	Ц_	NI(NIA)	
c) For wastes w/ treatment standards expressed as concentrations in waste, are treatment standards based in part/whole on alternative analytical detection limit? (40 CFR 268.7(b)(5)(iii)))	CLD		M GA	
partwinde on alternative analytical detection littlit? (40 CFR 200.7(b)(3)(lil)))	GLB   FQP517	6 (Rev. 5	NI N/A ) 5/03) Page 2	١

DETREX & PERMITTED STORAGE
FACILITY

4) Farmanda D004 D009 9 D049 D049 authorite 44 Annaharant Annaharant 1994 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9			
d) For wastes D001-D003 & D012-D043 subject to treatment standards (not expressed as method of treatment) & tare reasonably expected to contain underlying hazardous constituents did treatment on-site remove hazardous characteristic prior to being sent off-site to remove the hazardous constituents? (40 CFR 268.7(b)(5)(iv))	that GLB	1 1	NIADA (
e) For wastes D001-D003 and D012-D043 that contain underlying hazardous constituents did facility treat waste to remove hazardous characteristic & treat hazardous constituents to UST levels? (40 CFR 268.7(b)(5)(v))	GLB		N NA
18. If wastes or treatment residue will be further managed off-site at a new TSDF does facility comply w/ notice & certification requirements applicable to generators? (40 CFR 268.7(b)(6))	GLB	[2]	NI N/A
<ol> <li>For recyclable wastes used in a manner constituting disposal, does facility (recycler) submit certification &amp; notice to Regional Administrator or his/her designee? (40 CFR 268.7(b)(7))</li> </ol>	GLB		NI NÎÂ
20. Does recycling facility of waste used in manner constituting disposal keep records of name & location of each entity receiving hazardous waste-derived product? (40 CFR 268.7(b)(7))	GLB	_ لـا	NI NI
21. Do they have copies of notice & certifications specified in 268.8, if applicable? (40 CFR 268.7(c)(1))	GLB		NH(VA)
22. Does the facility: Not DISPOSING OF WASTE PER PERMIT			
<ul> <li>a) test waste or extract of waste or treatment residue to assure wastes or treatment residues are in compliance w/ applicable treatment standards? (40 CFR 268.7(c)(2))</li> </ul>	GLB	ιχι	NI N/A
b) perform tests in accordance to frequency specified in facility's waste analysis plan? (40 CFR 268.7(c)(2))	GLB	n/s	NI N/A
23. Do generators or treaters who first claim that hazardous debris is excluded from definition of hazardous waste do the	e following:		
a) submit one-time notification? (40 CFR 268.7(d)((1))	GLB	· 🗀 _	NI NA
b) update notification if debris is shipped to a different facility? (40 CFR 268.7(d)(2))	GLB	ட	NI (TA)
<ul> <li>c) update notification for debris excluded under 261.(f)(1), if a different type of debris is treated or if a different technology is used to treat? (40 CFR 268.7(d)(2))</li> </ul>	GLB		NIMA
<ul> <li>d) for debris excluded under 261.3(f)(1), does treatment facility document &amp; certify compliance w/ treatment standar Table 1 §268.45 as follows: (40 CFR 268.7(d)(3))</li> </ul>	ds of GLB	r 1	NI,AVA)
i) records kept of all inspections, evaluations, analysis of treated debris to determine compliance w/ treatment standards (40 CFR 268.7(d)(3)(l))	GLB		NI (VA)
ii) records of any data or information the treater obtained during treatment of debris that identifies key operating parameters of treatment unit? (40 CFR 268.7(d)(3)(ii))	GLB		NI MA
24. For each shipment of treated debris, required certification of compliance w/ treatment standards, signed by an authorized representative, is placed in the facility's files? (40 CFR 268.7(d)(3)(iii))	GLB	r 1	_ NYÑA)
NOTE: An alternate treatment standard may be used after approval from the Administrator. (40 CFR 268.44)  NOTE: Hazardous waste debris see 40 CFR 268.7(a)(1)(iv) for the notice requirements which must be followed by the si is subject to alternative treatment standards of 40 CFR 268.45."	tatement *	This haza	
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<ul> <li>NOTE: An alternate treatment standard may be used after approval from the Administrator. (40 CFR 268.44)</li> <li>NOTE: Hazardous waste debris see 40 CFR 268.7(a)(1)(iv) for the notice requirements which must be followed by the sit is subject to alternative treatment standards of 40 CFR 268.45."</li> <li>25. Does generator retain on-site data used to support waste determination based on knowledge or testing results? (40 CFR 268.7(a)(5))</li> <li>26. If restricted waste is excluded from definition of a hazardous or solid waste or is exempted from Subtitle C regulation generator place a one-time notice stating same in the facility file? (40 CFR 268.7(a)(6))</li> <li>27. Are all notices/certifications/demonstrations/other documents produced pursuant to Part 268, on-site &amp; retained for 5 from date the item is required to be produced? (40 CFR 268.7(a)(7))</li> <li>NOTE: This requirement (40 CFR 268.7(a)(7)) applies to solid waste even when the hazardous waste characteristic is retained from the definition of hazardous waste or solid waste.</li> </ul>	GLB , did  GLB i years  GLB	іХі Гі ІХі	NI N/A NI N/A
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NOTE: An alternate treatment standard may be used after approval from the Administrator. (40 CFR 268.44)  NOTE: Hazardous waste debris see 40 CFR 268.7(a)(1)(iv) for the notice requirements which must be followed by the si is subject to alternative treatment standards of 40 CFR 268.45."  25. Does generator retain on-site data used to support waste determination based on knowledge or testing results? (40 CFR 268.7(a)(5))  26. If restricted waste is excluded from definition of a hazardous or solid waste or is exempted from Subtitle C regulation generator place a one-time notice stating same in the facility file? (40 CFR 268.7(a)(6))  27. Are all notices/certifications/demonstrations/other documents produced pursuant to Part 268, on-site & retained for 5 from date the item is required to be produced? (40 CFR 268.7(a)(7))  NOTE: This requirement (40 CFR 268.7(a)(7)) applies to solid waste even when the hazardous waste characteristic is rethe waste is excluded from the definition of hazardous waste or solid waste.  DILUTION PROHIBITED AS SUBSTITUTE FOR TREATMENT (Rule 311(1): 40 CFR 28. Generator dilute hazardous waste or treatment residue of hazardous waste to avoid prohibition or to circumvent a lar disposal prohibition? (40 CFR 268.3(a))  TREATMENT STANDARDS (Rule 311(1): 40 CFR 268.40)  29. If wastes exceeding treatment standards are mixed, are most stringent standards selected? (40 CFR 268.40(c))  30. Once characteristic waste is no longer hazardous is one-time notification & certification placed in generators/treater' & sent to the state? (40 CFR 268.9(d))  31. Is notification & certification updated if process or operation generating waste is changed &/or if subtitle D facility receiving the waste changes? (40 CFR 268.9(d))  32. Does facility submit change notification/certification to state by 12/31 of the calendar year? (40 CFR 268.9(d))	GLB , did GLB ; years GLB emoved prid GLB GLB GLB GLB GLB GLB	IX.1	NI N/A
NOTE: An alternate treatment standard may be used after approval from the Administrator. (40 CFR 268.44)  NOTE: Hazardous waste debris see 40 CFR 268.7(a)(1)(iv) for the notice requirements which must be followed by the sis subject to alternative treatment standards of 40 CFR 268.45."  25. Does generator retain on-site data used to support waste determination based on knowledge or testing results? (40 CFR 268.7(a)(5))  26. If restricted waste is excluded from definition of a hazardous or solid waste or is exempted from Subtitle C regulation generator place a one-time notice stating same in the facility file? (40 CFR 268.7(a)(6))  27. Are all notices/certifications/demonstrations/other documents produced pursuant to Part 268, on-site & retained for 5 from date the item is required to be produced? (40 CFR 268.7(a)(7))  NOTE: This requirement (40 CFR 268.7(a)(7)) applies to solid waste even when the hazardous waste characteristic is rethe waste is excluded from the definition of hazardous waste or solid waste.  DILUTION PROHIBITED AS SUBSTITUTE FOR TREATMENT (Rule 311(1): 40 CFF 28. Generator dilute hazardous waste or treatment residue of hazardous waste to avoid prohibition or to circumvent a lar disposal prohibition? (40 CFR 268.3(a))  TREATMENT STANDARDS (Rule 311(1): 40 CFR 268.40)  29. If wastes exceeding treatment standards are mixed, are most stringent standards selected? (40 CFR 268.40(c))  30. Once characteristic waste is no longer hazardous is one-time notification & certification placed in generators/treater & sent to the state? (40 CFR 268.9(d))  31. Is notification & certification updated if process or operation generating waste is changed &/or if subtitle D facility receiving the waste changes? (40 CFR 268.9(d))  32. Does facility submit change notification/certification to state by 12/31 of the calendar year? (40 CFR 268.9(d))  Does the notification include:  a) name and address of the subtitle D facility receiving the waste? (40 CFR 268.9(d)(1)(i))	GLB , did GLB ; years GLB emoved prid GLB GLB GLB GLB GLB GLB	IX.1	NI N/A
NOTE: An alternate treatment standard may be used after approval from the Administrator. (40 CFR 268.44)  NOTE: Hazardous waste debris see 40 CFR 268.7(a)(1)(iv) for the notice requirements which must be followed by the sis subject to alternative treatment standards of 40 CFR 268.45."  25. Does generator retain on-site data used to support waste determination based on knowledge or testing results? (40 CFR 268.7(a)(5))  26. If restricted waste is excluded from definition of a hazardous or solid waste or is exempted from Subtitle C regulation generator place a one-time notice stating same in the facility file? (40 CFR 268.7(a)(6))  27. Are all notices/certifications/demonstrations/other documents produced pursuant to Part 268, on-site & retained for 5 from date the item is required to be produced? (40 CFR 268.7(a)(7))  NOTE: This requirement (40 CFR 268.7(a)(7)) applies to solid waste even when the hazardous waste characteristic is rethe waste is excluded from the definition of hazardous waste or solid waste.  DILUTION PROHIBITED AS SUBSTITUTE FOR TREATMENT (Rule 311(1): 40 CFF 28. Generator dilute hazardous waste or treatment residue of hazardous waste to avoid prohibition or to circumvent a lar disposal prohibition? (40 CFR 268.3(a))  TREATMENT STANDARDS (Rule 311(1): 40 CFR 268.40)  29. If wastes exceeding treatment standards are mixed, are most stringent standards selected? (40 CFR 268.40(c))  30. Once characteristic waste is no longer hazardous is one-time notification & certification placed in generators/treater' & sent to the state? (40 CFR 268.9(d))  31. Is notification & certification updated if process or operation generating waste is changed &/or if subtitle D facility receiving the waste changes? (40 CFR 268.9(d))  Does the notification include:  a) name and address of the subtitle D facility receiving the waste? (40 CFR 268.9(d)(1)(ii))  b) description of the waste as initially generated including: (40 CFR 268.9(d)(1)(ii))	GLB , did GLB syears GLB emoved prid GLB GLB GLB GLB GLB GLB	IX.1	NI N/A  NI N/A

· · · · · · · · · · · · · · · · · · ·	<u></u>	YES	NO ~
83. Is the certification signed by an authorized representative? (40 CFR 268.9(d)(2))	GLB	Ш	NI (V/A)
34. Does the certification statement include the language in 268.7(b)(5)? (40 CFR 268.9(d)(2))	GLB		N(N/A
35. If treatment removed characteristic but did not treat underlying hazardous constituents is certification in 268.7(b)(5)(iv) used? (40 CFR 268.9(d)(2)(i))	GLB		
COMMENTS:			
			-
			· · · · · · · · · · · · · · · · · · ·
			<del></del>

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# DEQ

# Department of Environmental Quality, Waste and Hazardous Materials Division USED OIL INSPECTION FORM— TRANSPORTERS AND TRANSFER FACILITIES

	l Facility's I	Name DETREX	Copperno	د,				Pari	t 8 Rules
[	Date	8/12/08	ID#	MID	091 605	972		_ 1994	PA 451
		d oil is defined as "any oil led with physical or chemic	which has been refine	d from crude (	-		ed and as a result of	use, is	
		U	SED OIL TRANSP	ORTERS AN	ID TRANSFER	FACILITIES (Rule 81	2)		
			NI –	Not Inspecte	d, N/A Not Appl	icable_		YES	NO
L	require	porter processes used oil ( ments in subpart F? (Rule	812(3): 40 CFR 279.4	1(a))		· · · · · · · · · · · · · · · · · · ·	UOA	Ц.	NI (NÎ/A
Ľ	2. If facility comply	y conducts processing ope w/ requirements in subpa	rations(occurring in in rt F? (Rule 812(3): 40	Ormal course CFR 279.41	of transportation) (b))	& produces a product, d	lo they UOA	LI.	_ NI(N/A)
[3	B. Facility	obtained an EPA identifica	ation number? (Rule 8	12(3): 40 CFI	R 279.42(a))		UOA	ΙΧΊ.	NI N/A
<u> </u>	4. Is all us	sed oil delivered to: (Rule	812(3): 40 CFR 279.4	(3(a))				<del></del>	
L	a)_anot	ther used oil transporter w	an EPA identification	number? (Ru	ule 812(3): 40 CFI	R 279.43(a)(1))	UOA	LJ.	NI N(A
$\vdash$	b) used	d oil processing/re-refining	facility w/ an EPA ide	ntification num	ber? (Rule 812(3)	: 40 CFR 279.43(a)(3))	UOA	以	NI N/A
$\vdash$	c) off-s	pecification used oil burner	facility w/ EPA identif	ication? (Rule	812(3):40 CFR 2	79.43(a)(3))	UOA	Ц.	NI M(A)
Ļ	d) on-s	pecification used oil burne	r? (Rule 812(3): 40	CFR 279.43(a	)(4))		AOU	LJ.	NI (V)
$\vdash$		e transporter comply w/ all					UOA	LJ.	NI (V/A
-		arge occurs during transpo tify local authorities, dike-				ect human health & envi	ronment UOA		_NINA
-7	7. If air, wa	ater, rail or highway transpo	orter discharges used	oil, does trans	sporter:: (Rule 812	(3): 40 CFR 279.43(c)(3	3))		
-	a) give	notice to the National Res	oonse Center, if requir	ed? (Rule 8	12(3) 40 CFR 279.	43(c)(3)(i))	UOA	<u> </u>	_NIMIA
L	b) repo	rt in writing as required to I	OOT? (Rule 812(3): 4	0 CFR 279.43	3(c)(3)(ii))	<del></del>	LOA	L.	NI NUA
		ater transporter who discha						<u>.                                    </u>	NI WA
$\Box$		ansporter clean up any disc						Ų.	NI(N/À
		oil was held over 35 days a						رکا_	NI N/A
-		stainers& aboveground tan			er facility: (Rule 8	12(3) : 40 CFR 279.45(b			
$\vdash$		od condition? (Rule 812(3			,		UOA	ΙΧI.	_ NI N/A
		eaking (no visible leaks)?					UOA	(4))	NI N/A
1		tainers used to store used s, berms, or retaining walls				em which has: (Rule 61.	2(3): 40 CFR 279.45 UOA		NI N/A
$\vdash$		w/in entire diked/bermed					UOA	7	
-		s and floors sufficiently imp			<u> </u>	2)) )	UOA	7.,	NI N/A NI N/A
_	C) Want	s and noors sumoremay imp	civious to used on: \	1 tale 0 12(0) 4		<u>-// /</u>		<del>                                      </del>	
Г					OR				
		quivalent secondary conta					UOA		NI(N/A)
13		veground tanks used to st				system which has:(Rule			
$\vdash$		s, berms or retaining wall?				D(4)(::))	UOA	7	NI N/A
-		w/in entire diked/bermed					UOA	7	NI N/A
L	c) wans	s and floor sufficiently impe	ervious to used on? (I	Kule 6 (2(3) . 4		(2) & (2/9.45 (1)(2))	UOA	<u> </u>	NI N/A
Γ-	٠			043/05/40 05	OR 270 54(-)(4)(iii)	<u> </u>			<u>F.</u>
		quivalent secondary contai					UOA	<u> </u>	_ NI WA
		veground tanks used to st						<u> </u>	
F		s, berms or retaining walls					UOA	<u> </u>	NI(Ñ/A)
$\vdash$		within the entire diked/ber & & floor sufficiently imperv						<u></u>	NI NIA
<u> </u>	c) walls	a noor sumciently imperv	ious to used oil: (Kult	5 0 10(0). (40 t	21 11 21 5.54(U)(2) 1	440 OFN 219.54(e)(2))	EQP5184 (R	ev. 4/0	

OR YES NO d) equivalent secondary containment system? (Rule 812(3):40 CFR 279.45(e)(1)(ii) & (f)(1)(iii)) UOA 14. Containers & tanks for storage of used oil a transfer facility labeled/marked "Used Oil"?(Rule 812(3): 40 CFR 279.45(g)(1)) UOA NI N/ 15. Are fill pipes that transfer used oil into underground storage tanks at transfer facilities labeled/marked "Used Oil"? NI NA (Rule 812(3): 40 CFR 279.45(g)(2)) UOA 16. Upon detection of a release did the facility: a) stop the release? (Rule 812(3):Rule 810: 40 CFR 279.45(h)(1)) UOA NI MOX NI (V) b) contain the released oil?(Rule 812(3): Rule 810: 40 CFR 279.45(h)(2)) UOA c) clean up & manage released used oil & other material? (Rule 812(3): Rule 810: 40 CFR 279.45(h)(3)) NINL UOA d) if necessary to prevent future releases, repair/ replace any leaking oil containers or tanks? (Rule 812(3): Rule 810: N(N) UOA II 40 CFR 279.45 (h)(3)) 17. Does used oil transporter keep record of each used oil shipment accepted for transport? (Rule 812(3): Rule 810: 40 CFR 279.46(a)) UOA NI N/A 18. Does record include: (Rule 812(3): Rule 810: 40 CFR 279.46(a)) a) name& address of facility that provided used oil for transportation?(Rule 812(3): Rule 810: 40 CFR 279.46(a)(1)) UOA NI N/A b) EPA or state identification number of facility that provided the used oil for transportation? (Rule 812(3):to Rule 810: 40 CFR 279.46(a)(2)) UOA NI N/A c) the quantity of used oil accepted? (Rule 812(3): Rule 810:40 CFR 279.46(a)(3)) UOA NI N/A d) the date of acceptance? (Rule 812(3): Rule 810: 40 CFR (279.46(a)(4)) UOA NI N/A e) signature of representative from facility that provided used oil for transportation? (Rule 812(3): Rule 810: 40 CFR (279.46(a)(5)(i) (except for immediate rail transporters (279.46(a)(5)(ii)) UOA NI N/A 19. Does used oil transporter keep record of each shipment of used oil delivered to another transporter, burner, processor, disposal, facility or exported? (Rule 812)3): Rule 810: 40 CFR (279.46(b) & 279.46(c)) Does it include: LOA NI N/A a) name& address of facility, if applicable that provided used oil for transportation? (Rule 812(3):Rule 810: 40 CFR 279.46(b)(1) & 279.46(c)) UOA NI N/A b) EPA identification number of facility, if applicable, that provided the used oil for transportation? (Rule 812(3):Rule 810 which refers to 40 CFR 279.46 (b)(2) & 279.46(c)) UOA NI N/A c) quantity of used oil delivered?(Rule 812(3): Rule 810: 40 CFR 279.46 (b)(3) & 279.46(c) UOA NI N/A d) date of delivery? (Rule 812)(3): Rule 810: 40 CFR 279.46(b)(4) & 279.46(c)) UOA NI N/A e) signature of representative from facility that provided used oil for transportation? (Rule 812(3): Rule 810: 40 CFR (b)(5)(i) & 279.46(c))) (except for intermediate rail transporters (279.46(a)(5)(ii)) UOA NI N/A 20. Are records maintained for at least three years? (Rule 812(3): Rule 810:40 CFR 279.46(d)) UOA NI N/A 21. Does transporter determine that used oil transported or stored is not a hazardous waste by either: (Rule 214(4) UOA a) testing the used oil for total halogen? NI N/A b) applying knowledge of halogen content in light of the materials or processed used? UOA NI N/A UOA c) obtain copies of analysis or other information from generator? NI N/A 22. Are copies of analysis/information maintained for a period of not less than three years? (Rule 812(4)) UOA NI N/A 23. Does the used oil transfer facility store used oil in units other than containers or tanks? (Rule 812(5)) UOA [Å] NI N/A 24. Does transporter who generates residues from storage or transport of used oil manage them correctly? (Rule 812(6)) UOA NI N/A **USED OIL DISPOSAL** (Rule 816) 25. Is used oil that could not be recycled & is being disposed of & was not a hazardous waste managed in accordance UOA w/ applicable federal & state regulations? (Rule 816(2)) UOA 26. Is used oil used as a dust suppressant? (Rule 816(3)) M IN PA **COMMENTS:-**

# **Attachment 5**

Universal Waste Small Quantity Handler Inspection Form

DEQ

# Department of Environmental Quality, Waste and Hazardous Materials Division UNIVERSAL WASTE

	CORPORATION			Р	art 2 Rule
Date 812 lo 8	ID# <u><i>iM</i></u>	1D 091 605 972	2	19	994 PA 4
INVESTIGATIVA					
UNIVERSAL WAS BULBS	DIE	QUANTITY (< 5000	v kg or 11,000	ibs/year	1
150433	<del></del>			····	:
					<u>.</u>
incandescent lamps, and cathode	ent, high intensity dischar	ge (HID), sodium vapor, mercury v			mental
	PROHIBITIONS (Rul	e 228(4): 40 CFR 273.11)		YES (	NO
1. SQH disposed of universal waste? (Rule 22			UWR	1	M IN [X
<ol><li>SQH diluted or treated universal waste, exc (Rule 228(4): 40 CFR 273.11(b))</li></ol>	ept responding to releases of	or managing certain waste?	UWR		XININ
	Universal Waste Batter	ies: (Rule 228(4): 273.13(a))		<b>.</b>	
3. Are batteries that show evidence of leakag (Rule 228(4): 40 CFR 273.13(a)(1))			UWR	ļ, ,	NI AG
3. Are batteries that show evidence of leakage (Rule 228(4): 40 CFR 273.13(a)(1))  4. If batteries are contained, are containers of leakage, spillage or damage that could cause.	e, spillage, or damage that o	could cause leaks contained?		[]_	
(Rule 228(4): 40 CFR 273.13(a)(1))  4. If batteries are contained, are containers of leakage, spillage or damage that could cau	e, spillage, or damage that colosed & structurally sound, colose leakage? (Rule 228 (4): 4 rted by type, mixed types in batteries or cells, removed from the colose that the c	could cause leaks contained?  compatible w/ contents of battery & la 40 CFR 273.13(a)(1))  container, discharging to remove ele- om consumer products or removed e	ck evidence of I UWR ctric charge,	[ ]	NI W
<ul> <li>(Rule 228(4): 40 CFR 273.13(a)(1))</li> <li>4. If batteries are contained, are containers of leakage, spillage or damage that could cause.</li> <li>5. Are only the following activities allowed: so regenerated, disassembled into individual locastings of each battery not breached &amp; re (Rule 228(4): 40 CFR 273.13(a)(2))</li> </ul>	e, spillage, or damage that colosed & structurally sound, colose leakage? (Rule 228 (4): 4 rted by type, mixed types in batteries or cells, removed from intact & closed (except	could cause leaks contained?  compatible w/ contents of battery & la 40 CFR 273.13(a)(1))  container, discharging to remove electrolyte)?	ctric charge, electrolyte, &	[][][][]	NI (NI
<ul> <li>(Rule 228(4): 40 CFR 273.13(a)(1))</li> <li>4. If batteries are contained, are containers of leakage, spillage or damage that could cause.</li> <li>5. Are only the following activities allowed: so regenerated, disassembled into individual locastings of each battery not breached &amp; re (Rule 228(4): 40 CFR 273.13(a)(2))</li> <li>6. If electrolyte is removed or other wastes ge (Rule 228 (4): 40 CFR 273.13(a)(3))</li> <li>a. If electrolyte or other waste is characteris (Rule 228 (4): 40 CFR 273.13(a)(3)(i))</li> </ul>	e, spillage, or damage that colosed & structurally sound, colose leakage? (Rule 228 (4): 4 orted by type, mixed types in batteries or cells, removed from ain intact & closed (except merated, is it determined where the compliant in the compliant is it managed in compliant in the	could cause leaks contained?  compatible w/ contents of battery & la 40 CFR 273.13(a)(1))  container, discharging to remove elector consumer products or removed et to remove electrolyte)?  ether it is hazardous waste?	ctric charge, electrolyte, &		NI (W)
<ul> <li>(Rule 228(4): 40 CFR 273.13(a)(1))</li> <li>4. If batteries are contained, are containers of leakage, spillage or damage that could cause.</li> <li>5. Are only the following activities allowed: so regenerated, disassembled into individual locastings of each battery not breached &amp; re (Rule 228(4): 40 CFR 273.13(a)(2))</li> <li>6. If electrolyte is removed or other wastes ge (Rule 228 (4): 40 CFR 273.13(a)(3))</li> <li>a. If electrolyte or other waste is characteris (Rule 228 (4): 40 CFR 273.13(a)(3)(i))</li> <li>b. If electrolyte or other waste is not characteris (Rule 228 (4): 40 CFR 273.13(a)(3)(ii))</li> </ul>	e, spillage, or damage that colosed & structurally sound, colosed & structurally sound, colosed leakage? (Rule 228 (4): 4 orted by type, mixed types in patteries or cells, removed from ain intact & closed (except merated, is it determined where the complex is it managed in compliant teristic is it managed in complex teristic is it managed in complex in the complex	could cause leaks contained?  compatible w/ contents of battery & la 40 CFR 273.13(a)(1))  container, discharging to remove elector consumer products or removed et to remove electrolyte)?  ether it is hazardous waste?  conce with Part 260-272?	ctric charge, electrolyte, &  UWR  UWR  UWR  UWR  UWR		NI WI
<ul> <li>(Rule 228(4): 40 CFR 273.13(a)(1))</li> <li>4. If batteries are contained, are containers of leakage, spillage or damage that could cause.</li> <li>5. Are only the following activities allowed: so regenerated, disassembled into individual locatings of each battery not breached &amp; re (Rule 228(4): 40 CFR 273.13(a)(2))</li> <li>6. If electrolyte is removed or other wastes ge (Rule 228 (4): 40 CFR 273.13(a)(3))</li> <li>a. If electrolyte or other waste is characteris (Rule 228 (4): 40 CFR 273.13(a)(3)(i))</li> <li>b. If electrolyte or other waste is not characteris removed in the characteris (Rule 228 (4): 40 CFR 273.13(a)(3)(i))</li> </ul>	e, spillage, or damage that colosed & structurally sound, colose leakage? (Rule 228 (4): 4 red by type, mixed types in batteries or cells, removed from ain intact & closed (except merated, is it determined where the compliant teristic is it managed in compliant teristic is it managed in completed w/ either: "UNIVERSAL	could cause leaks contained?  compatible w/ contents of battery & la 40 CFR 273.13(a)(1))  container, discharging to remove elector consumer products or removed et to remove electrolyte)?  ether it is hazardous waste?  conce with Part 260-272?	ctric charge, electrolyte, &  UWR  UWR  UWR  UWR  UWR		NI (W)
<ul> <li>(Rule 228(4): 40 CFR 273.13(a)(1))</li> <li>4. If batteries are contained, are containers of leakage, spillage or damage that could cause.</li> <li>5. Are only the following activities allowed: so regenerated, disassembled into individual locastings of each battery not breached &amp; re (Rule 228(4): 40 CFR 273.13(a)(2))</li> <li>6. If electrolyte is removed or other wastes ge (Rule 228 (4): 40 CFR 273.13(a)(3))</li> <li>a. If electrolyte or other waste is characteris (Rule 228 (4): 40 CFR 273.13(a)(3)(i))</li> <li>b. If electrolyte or other waste is not charact (Rule 228 (4): 40 CFR 273.13(a)(3)(ii))</li> <li>7. Are batteries or containers of batteries labor "USED BATTERIES". (Rule 228 (4): 40 CFR 273.13(a)(a)(a)(a)(a)(a)(a)(a)(a)(a)(a)(a)(a)(</li></ul>	e, spillage, or damage that colosed & structurally sound, colose leakage? (Rule 228 (4): 4 red by type, mixed types in batteries or cells, removed from ain intact & closed (except nerated, is it determined whe stic is it managed in compliant teristic is it managed in completed w/ either: "UNIVERSAL CFR 273.14(a))	could cause leaks contained?  compatible w/ contents of battery & la 40 CFR 273.13(a)(1))  container, discharging to remove electron consumer products or removed et to remove electrolyte)?  ether it is hazardous waste?  conce with Part 260-272?  collance with Part 115 of 451?  WASTE-BATTERIES" or "WASTE BATTERIES" or "WAST	ctric charge, electrolyte, & UWR  UWR  UWR  UWR  UWR  UWR  UWR  UWR		NI (NI NI (NI NI (NI NI (NI
<ul> <li>(Rule 228(4): 40 CFR 273.13(a)(1))</li> <li>4. If batteries are contained, are containers of leakage, spillage or damage that could cause that castings of each battery not breached &amp; re (Rule 228(4): 40 CFR 273.13(a)(2))</li> <li>6. If electrolyte is removed or other wastes ge (Rule 228 (4): 40 CFR 273.13(a)(3))</li> <li>a. If electrolyte or other waste is characteris (Rule 228 (4): 40 CFR 273.13(a)(3)(i))</li> <li>b. If electrolyte or other waste is not characteris (Rule 228 (4): 40 CFR 273.13(a)(3)(ii))</li> <li>7. Are batteries or containers of batteries laber "USED BATTERIES". (Rule 228 (4): 40 CFR 273.13(a)(3)(ii))</li> </ul>	e, spillage, or damage that colosed & structurally sound, colosed & structurally sound, colosed leakage? (Rule 228 (4): 4 of the day type, mixed types in patteries or cells, removed from ain intact & closed (except merated, is it determined who stic is it managed in compliant teristic is it managed in completed w/ either: "UNIVERSAL CFR 273.14(a))  Universal Waste Pesticiesticides in containers that are	could cause leaks contained?  compatible w/ contents of battery & la 40 CFR 273.13(a)(1))  container, discharging to remove electron consumer products or removed et to remove electrolyte)?  ether it is hazardous waste?  conce with Part 260-272?  collance with Part 115 of 451?  WASTE-BATTERIES" or "WASTE BATTERIES" or "WAST	ctric charge, electrolyte, & UWR  UWR  UWR  UWR  UWR  UWR  UWR  UWR		NI (W)
(Rule 228(4): 40 CFR 273.13(a)(1))  4. If batteries are contained, are containers of leakage, spillage or damage that could cause.  5. Are only the following activities allowed: so regenerated, disassembled into individual locatings of each battery not breached & re (Rule 228(4): 40 CFR 273.13(a)(2))  6. If electrolyte is removed or other wastes ge (Rule 228 (4): 40 CFR 273.13(a)(3))  a. If electrolyte or other waste is characteris (Rule 228 (4): 40 CFR 273.13(a)(3)(i))  b. If electrolyte or other waste is not characteris (Rule 228 (4): 40 CFR 273.13(a)(3)(ii))  7. Are batteries or containers of batteries labe "USED BATTERIES". (Rule 228 (4): 40 CFR 273.13(b) (2) (3) (3) (4) (4) (4) (4) (5) (6) (6) (6) (7) (7) (7) (7) (8) (8) (9) (9) (9) (9) (9) (9) (9) (9) (9) (9	e, spillage, or damage that colosed & structurally sound, colose leakage? (Rule 228 (4): an eleakage? (Rule 228 (4	could cause leaks contained?  compatible w/ contents of battery & la 40 CFR 273.13(a)(1))  container, discharging to remove electron consumer products or removed et to remove electrolyte)?  ether it is hazardous waste?  container with Part 260-272?  collance with Part 115 of 451?  WASTE-BATTERIES" or "WASTE Batter (Rule 228(4): 273.13(b))  e closed, structurally sound & compation container? (Rule 228 (2): 40 CFR273	ctric charge, electrolyte, &  UWR  UWR  UWR  UWR  UWR  UWR  UWR  ATTERIES* or  UWR		
(Rule 228(4): 40 CFR 273.13(a)(1))  4. If batteries are contained, are containers of leakage, spillage or damage that could cause.  5. Are only the following activities allowed: so regenerated, disassembled into individual locastings of each battery not breached & re (Rule 228(4): 40 CFR 273.13(a)(2))  6. If electrolyte is removed or other wastes ge (Rule 228 (4): 40 CFR 273.13(a)(3))  a. If electrolyte or other waste is characteris (Rule 228 (4): 40 CFR 273.13(a)(3)(i))  b. If electrolyte or other waste is not characteris (Rule 228 (4): 40 CFR 273.13(a)(3)(ii))  7. Are batteries or containers of batteries labe "USED BATTERIES". (Rule 228 (4): 40 CFR 273.13(b) (4): 40 CFR 273.13(b)  8. Handler prevents releases by containing perpesticide? (Rule 228 (4): 40 CFR 273.13(b)  9. If original container is in poor condition, is in 10. If stored in tank, are requirements of 40 Circles (Rule 228 in tank).	e, spillage, or damage that colosed & structurally sound, colose leakage? (Rule 228 (4): an eleakage? (Rule 228 (4	could cause leaks contained?  compatible w/ contents of battery & la 40 CFR 273.13(a)(1))  container, discharging to remove electron consumer products or removed et to remove electrolyte)?  ether it is hazardous waste?  container with Part 260-272?  collance with Part 115 of 451?  WASTE-BATTERIES" or "WASTE Batter (Rule 228(4): 273.13(b))  e closed, structurally sound & compation container? (Rule 228 (2): 40 CFR273	ctric charge, electrolyte, &  UWR  UWR  UWR  UWR  UWR  UWR  UWR  ATTERIES* or  UWR		
(Rule 228(4): 40 CFR 273.13(a)(1))  4. If batteries are contained, are containers of leakage, spillage or damage that could cause.  5. Are only the following activities allowed: so regenerated, disassembled into individual locatings of each battery not breached & re (Rule 228(4): 40 CFR 273.13(a)(2))  6. If electrolyte is removed or other wastes ge (Rule 228 (4): 40 CFR 273.13(a)(3))  a. If electrolyte or other waste is characteris (Rule 228 (4): 40 CFR 273.13(a)(3)(i))  b. If electrolyte or other waste is not characteris (Rule 228 (4): 40 CFR 273.13(a)(3)(ii))  7. Are batteries or containers of batteries labe "USED BATTERIES". (Rule 228 (4): 40 CFR 273.13(b) (2) (3) (3) (4) (4) (4) (4) (5) (6) (6) (6) (7) (7) (7) (7) (8) (8) (9) (9) (9) (9) (9) (9) (9) (9) (9) (9	e, spillage, or damage that colosed & structurally sound, colose leakage? (Rule 228 (4): and the structurally sound, colose leakage? (Rule 228 (4): and the structure of the str	could cause leaks contained?  compatible w/ contents of battery & la 40 CFR 273.13(a)(1))  container, discharging to remove elector consumer products or removed et to remove electrolyte)?  ether it is hazardous waste?  conce with Part 260-272?  Diliance with Part 115 of 451?  WASTE-BATTERIES" or "WASTE BATTERIES" or "WASTE BATTERIES" or "WASTE BATTERIES" or "CONTENT CONTENT CONTE	ctric charge, electrolyte, & UWR  UWR  UWR  UWR  UWR  UWR  ATTERIES* or UWR  UWR  ATTERIES* UWR		

## Universal Waste Mercury Devices

(Thermostats, Mercury switch, Mercury thermometer, or a waste device which contains only (Rule 228(4); 273.13(c))	element		nerc S N		
13. Are mercury devices that show evidence of leakage, spillage, or damage that could cause leaks contained? (Rule 228(4): 40 CFR 273.13(c)(1))	UWR	ı	1_	NI	Ńλ
14. If mercury devices are contained, are containers closed, structurally sound, compatible w/ contents or thermostats & evidence of leakage, spillage or damage that could cause leakage? (Rule 228(4): 40 CFR (273.13(c)(1))	lack UWR	ı	1_	N	(NTA
15. If ampules are removed:					
a does facility try to prevent breakage & is removal done over containment device?		-			-
(Rule 228(4): 40 CFR 273.13(c)(2)(i ⅈ))  b. is clean-up system available to transfer spilled material to another container & used immediately?	UWR		1	NI	₩.
(273.13(c)(2)(iii& iv))	UWR	1_	1_	NI	(N/A
c. is area well ventilated & monitored? (Rule 228 (4): 40 CFR 273.13(c)(2)(v))	UWR	L	1_	NI	NA
d. are employees familiar w/ proper waste handling & emergency procedures? (Rule 228(4): 40 CFR 273.13(c)(2)(vi)	) UWR	1		NI	(A)
e. removed ampules stored in closed, non-leaking container? (Rule 228(4): 40 CFR 273.13(c)(2)(vii))	UWR		1_	N	N/A
f. removed ampules packed in container w/ packing material? (Rule 228 (4): 40 CFR 273.13(c)(2)(vii))	UWR	1	1_	Ni	(N/A)
16. If mercury or clean-up residues are generated is it determined whether it is hazardous waste? (Rule 228(4): 40 CFR 273.13(c)(3)(i)(A&B))	UWR		1_	NI	WA.
a. If waste is characteristic, is it managed in compliance w/ part 260-272? (Rule 228(4): 40 CFR 273.13(c)(3)(ii)	UWR	1	1_	NI	N/A
b. Of waste that isn't characteristic, is it managed in compliance with Part 115 and 121 of Act 541? (Rule 228(4): 40 CFR 273.13(c)(3)(iii))	UWR	1_	1_	Ni	N(A)
17. Are mercury devices or containers of mercury devices labeled either "UNIVERSAL WASTE or WASTE or USED MERCURY (with type e.g., thermostat, switch, thermometer, device](s)"? (Rule 228(4): 40 CFR 273.14(d))	UWR	_1_	1_	NI	
Universal Waste Electric Lamps: (Rule 228(4))				<del>/</del>	
18. Are lamps crushed or broken? (electric lamps shall not be crushed or broken) (Rule 228(4)(c)(i))	UWR		14	<u> </u>	N/A
<ol> <li>Are lamps managed in a manner to prevent breakage or the release of any universal waste or components of universal waste by containing unbroken lamps in structurally sound packaging that is compatible w/ contents of lamps &amp; will pibreakage? (Rule228(4)(c)(ii))</li> </ol>		τX	<u>′1 –</u>	NI	N/A
20. Are lamp fragments or residues, & all lamps that show evidence of breakage, leakage, or damage that could cause release of mercury or other hazardous constituents to the environment immediately contained in packaging that is structurally sound & compatible w/ content ? (Rule 228(4)(c)(iii)(A))	UWR	_1_	1_	NI	N/A
21. If lamp fragment or residues are generated is it determined whether it is hazardous waste? (Rule 228(4)(c)(iii)(B))	UWR		1_	NI	NA
a. If waste is characteristic is it managed in compliance w/ 40 CFR Part 260-272 & Part 111 of Act 451?	UWR		1_	NI	WA
b. If waste isn't characteristic is it managed in compliance w/ Part 115 of Act 451?	UWR		1_	N	(N/A)
22. Are lamps or packaging in which the lamps are contained labeled either "UNIVERSAL WASTE or WASTE or "USED ELECTRIC LAMP(s)". (Rule 228(4)(c)(iv))	UWR	ſΧ	1_	Ni	N/A
ACCUMULATION TIME LIMITS (Rule 228(4): 40 CFR 273.15)			<del></del>		
23. Accumulated less than one year? (Rule 228(4): 40 CFR 273.15(a )) OR (if no go to question 24)	UWR		<b></b>	Ni	N/A
24. If accumulated over one year, is accumulation necessary to facilitate proper recovery, treatment or disposal (burden handler to demonstrate)? (Rule 228(4): 40 CFR 273.15(b))	UWR		1	NI	NA
25. Is the length of time universal wastes stored documented by one of the following:					
a. mark or label container with earliest date when universal waste became a waste?  (Rule 228(4): 40 CFR 273.15(c)(1))	UWR	ιX	1_	Ni	(A)
b. mark or label individual items of universal waste w/ earliest date it became a waste?	UWR	_1_	1_	NI	N(A)
(Rule 228(4): 40 CFR 273.15(c)(2))	OVVIC				
c. maintain an inventory system on-site that identifies date an item became a universal waste? (Rule 228(4): 40 CFR 273.15(c)(3))	UWR	ίχ	1_	Ni	N/A
c. maintain an inventory system on-site that identifies date an item became a universal waste? (Rule 228(4): 40 CFR 273.15(c)(3)) d. maintain an inventory system on-site that identifies earliest date items in a group or group of containers became a universal waste? (Rule 228(4): 40 CFR 273.15(c)(4))		ī	1 <u> </u>		
c. maintain an inventory system on-site that identifies date an item became a universal waste? (Rule 228(4): 40 CFR 273.15(c)(3)) d. maintain an inventory system on-site that identifies earliest date items in a group or group of containers became a	UWR	ı T	l_ l_ l_		N/A
c. maintain an inventory system on-site that identifies date an item became a universal waste? (Rule 228(4): 40 CFR 273.15(c)(3))  d. maintain an inventory system on-site that identifies earliest date items in a group or group of containers became a universal waste? (Rule 228(4): 40 CFR 273.15(c)(4))  e. placed universal waste in a specific accumulation area & identifying start date or date received?	UWR UWR UWR		1_	NI NI	N/A

<b>EMPLOYEE TRAINING</b> (Rule 228(4): 40 CFR 273.16)		YES	NO	
26. Are employees familiar w/ universal waste handling/emergency procedures, relative to their responsibilities?  (Rule 228(4): 40 CFR 273.16))	UWR	Kı	NI	N
RESPONSE TO RELEASE (RULE 228(4): 40 CFR 273.17)				
27. Are releases of universal waste and other residue immediately contained? (Rule 228(4): 40 CFR 273.17(a))	UWR		NI	Ñ
28. Is material from a release characterized? (Rule 228(4): 40 CFR 273.17(b))	UWR		NI	N)
29. If released material is hazardous waste is it managed as required under Parts 260 – 271?	•			1
(Rule 228(4): 40 CFR273.17(b))	UWR	Ш	NI	(N
OFF-SITE SHIPMENTS (Rule 228(4): 40 CFR 273.18)				
30. Is waste sent to another handler, destination facility or foreign destination? (Rule 228(4): 40 CFR 273.18(a))	UWR	N/1	Ni	N.
31. If waste is a hazardous material are DOT requirements met w/ regard to package/labels/placards/shipping papers?  (Rule 228(4): 40 CFR 273.18(c))	UWR	[N]		N.
32. Prior to shipping universal waste off-site does receiver agree to receive shipment? (Rule 228(4):40 CFR 273.18(d))	UWR	ואו	NI	A
33. If the SQH self-transports waste does it comply w/ the universal waste transporter requirements? (Rule 228(4)(b): 40 CFR 273.18(b))	UWR		NI	×
34. If universal waste shipped off-site is rejected by other handler or destination facility, does the originating handler eith	er:			_
a. receive the waste back? Rule 228(4): 40 CFR 273.18(e)(1))	UWR		NI	R
b. agree to where shipment will be sent? (Rule 228(4): 40 CFR 273.18(e)(2))	UWR	[ ]	NI	À
35. If handler rejects part or full load from another handler, does the receiving handler contact the originating handler &	discuss ei	ther:		_
a. sending waste back to originating handler (Rule 228(4): 40 CFR 273.18(f)(1))	UWR	[ ]	NI	(
b. agree to where shipment will be sent? (Rule 228(4): 40 CFR 273.18(f)(2))	UWR	1	NI	7
36. If handler receives shipment of hazardous waste that isn't universal waste, is MDEQ immediately notified? (Rule 228(4):40 CFR 273.18(g))	UWR	١		N
<ol> <li>If handler receives a shipment of non-hazardous, non-universal waste is the waste managed in accordance w/ solid waste regulations? (Rule 228(4): 40 CFR 273.18(h))</li> </ol>	_UWR_		NI	Í
<b>EXPORTS</b> (Rule 228(4): 40 CFR 273.20)				`
38. Of waste that is sent to a foreign destination do they:				
a. comply w/ primary exporter requirements in 40 CFR 262.53, 262.56(a)(1-4 &6) and(b) and 262.57? (Rule 228(4): 40 CFR 273.20 (a))	UWR	L	NI	N
b. export w/ consent of receiving country and in compliance with Acknowledgment of Consent, Subpart E, .262? (Rule 228(4): 40 CFR 273.20(b))	UWR	ب	N	N N
c. provide copy of Acknowledgement of Consent to transporter? (Rule 228(4): 40 CFR 273.20 (c))	UWR	سا	NI	N/
		C	OMME	NT
		-		
<del></del>	<u> </u>			
·				
				_
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·			ev 4/03) F	

# Attachment 6

Inspection Checklist for Subpart CC: Air Emission Standards

## Inspection Checklist for Subpart CC: Air Emission Standards (Containers)

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Item # 40 CFR:

CC-1 265. 1080 Do any of the following exclusions apply? If yes, please circle.

YES



Applicability: The air emission requirements apply to units subject to subpart I \* unless the following apply (circle if applicable):

- 1. Waste was placed in unit prior to Oct. 6, 1996, and none has been added since.
- 2. The container capacity is less than .1 cubic meter (26 gallons)
- 3. A unit (e.g. tank) has stopped adding waste and is undergoing closure
- 4. The unit is used solely for onsite treatment or storage as a result of remedial activities required under corrective action, Superfund, or other similar state program
- 5. The unit is used solely to manage radioactive mixed waste
- 6. The unit is regulated by and operates in accordance with Clean Air Act regulations
- \*Note: 1. Satellite containers are exempt 2. CESQG's and SQG's are exempt

CC-2 265.1083 Do any of the following exemptions apply? If yes, please circle

YES



General Standards: The owner/operator must control air emissions from waste management units except the unit is exempt if (please circle if applicable):

- 1. All hazardous waste entering the unit has an average VO concentration at the point of origination less than 500 parts per million by weight (waste determination required)
- 2. The organic content of all waste entering the unit has been reduced by one of the 8 acceptable destruction or removal processes.
- 3. The unit is a tank used for certain biological treatment
- 4. The hazardous waste placed in the unit meets the LDR numerical concentration limits or has been treated using the specified LDR treatment technology (for organics)
- 5. The unit is a tank used for bulk feed to an incinerator and meets certain requirements

CC-3 265.1084 Waste Determination:

Determination Not Needed

Conservation vents are not allowed

265.1087(b)(2)



Was the VO concentration properly determined for each waste which the facility manages in a unit which does not meet Subpart CC requirements? The concentration must be determined by either direct measurement or knowledge. Please see 265.1084 for specific requirements for measurement and knowledge. Determination is <u>not</u> needed for waste managed in containers which meet standards. It may be necessary to evaluate container management prior to requiring VO concentration determination.

#	NA=Not Appli		INER MANAGEMENT 265,1087	NA	NI	ОК	\$
	Lev	el 1	Level 2		Le	vel 3	
equal to	122 gallons, ond do not ma	ons and less than or or larger than 122 mage H.W. in light	Larger than 122 gallons and manage H.W. "in light material service" (definition at 265.1081)	_	an 26.4 ga	lons and tre	eat H.W.
CC-4	265.1087	Con	trols	NA	NI	ок	DF
	e following:	et DOT requirements	One of the following: -Use containers that meet DOT requirements	-Container		abilize H.W.	

	Level	1	Level 2		Level 3		
#	NA=Not Appli	cable, NI=Not Inspected, OK	= In Compliance, DF= Deficiency	(NA)	NI	ок	DE
CC -5	265.1087	Waste trans	fer requirements				
No waste	e transfer requi	rements apply	-Waste transfer requirements apply regardless of container alternative used in level 2  -Transfer waste into or out of a container in such a manner as to minimize exposure of the waste to the atmosphere. Acceptable methods include a submerged fill pipe, vapor recovery system, or fitted opening with a line purge 265.1087(b)(3)	Not appli	cable		
CC-6	265.1087	Operatin	g requirements	(NA)	NI	ОК	DF
1. Whe 2. between perfectors 3. Whil 4. Consecution-Container-Safety version-A cover	on transferring ween batch transforming the transposed) le performing servation and sers may be operated and convalves and convalves and converged transposers.	sampling and equipment safety vents are allowed on while performing sam servation vents may be u	ontainers ninutes between transfer (note: if the person the process shuts down, the container must be	device, the criteria the have closed -If an encounter the specified Verification Total Encounter The contact - The	pors are directed at must be need vent and colosure is used design and in "Procedur on of a Permilosure" under ainer, enclosit system ma	fic design and the same as the control deviced, the encloss operating or Telephone Tel	and operating anks that the systems ure must iteria for and emporary 2.741 device or
CC-7	265.1089	Inspection	requirements	NA	NI	OK)	DF
- when fa -if wastes If inspect	s are stored gre	container and it is not encater than a year, then vi	nptied within 24 hours sually inspect once a year o written plan and schedule to perform inspection	Inspection tanks	ı requiremen	ts are the sar	ne as for
CC- 8	265.1087	Repair requi	rements	(NA)	NI	ОК	DF
	r within 5 cale		hin 24 hours must be made and: remove the container from service	immediate	corrective nely implement	ited to ensur	e that the
1. Repair 2. Do no				١ ـــ			
1. Repair 2. Do no	7(c)(4), (d)(4) 265.1090	Danisland	g requirements	NA NI OK DF  Depends upon how the organic emissions vented:  -If an enclosure is used, records must be maintained for the most recent set of calculations and measurements performed verify that the enclosure meets the criter a permanent total enclosure (Procedure - Records for the closed vent and control device system are the same for those used			DE



Figure 1: Fence line / gate of the facility along Eaton Ave.



Figure 2: East gate of the facility.

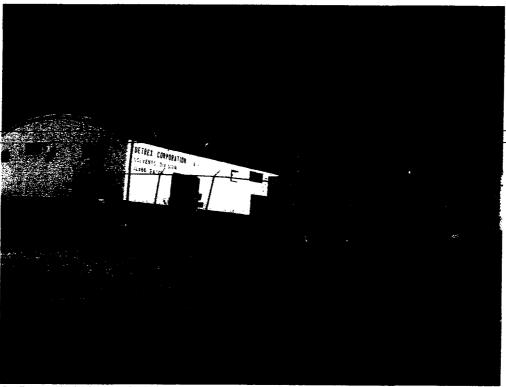


Figure 3: Detrex building on the left / trailer located inside facility fence.



Figure 4: Five drums located on a concrete pad north of Container Storage Area 11. The yellow drum contained spill control equipment. Note the condition of the drums.



Figure 5: Markings on the containers.

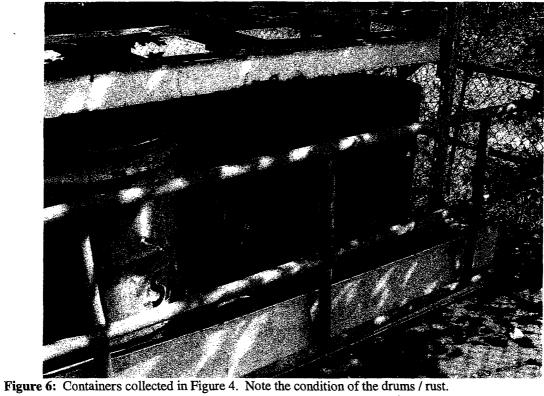




Figure 7: Four 55-gallon containers located on a concrete pad north of Container Storage Area 11. Note the condition of the drums / rust.



Figure 8: Close-up of markings on drum (second from the right in Figure 7).

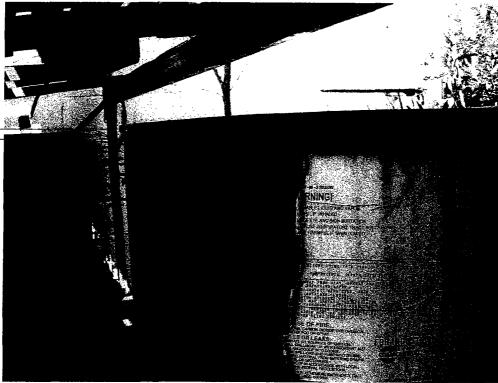


Figure 9: Label on drum (far right in Figure 7).

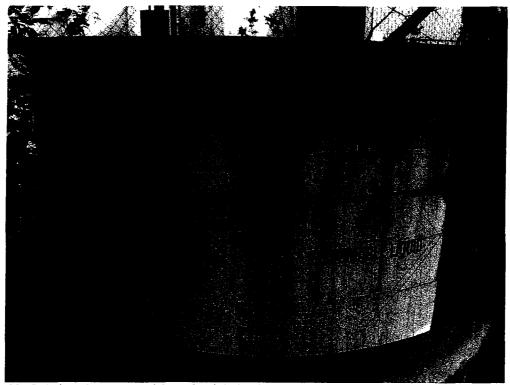


Figure 30: Label on drum (second from the right in Figure 7).

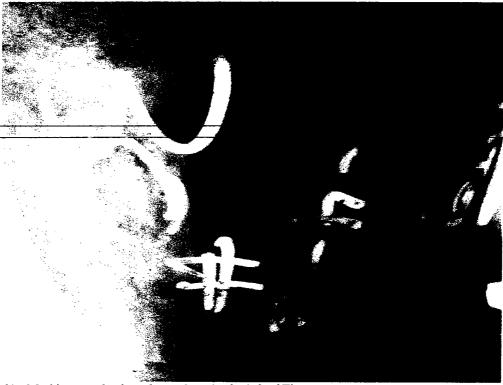


Figure 41: Markings on the drum located on the far left of Figure 7.



Figure 52: Drums located on the concrete pad north of Container Storage Area 11. Note the condition of the drums / rust.

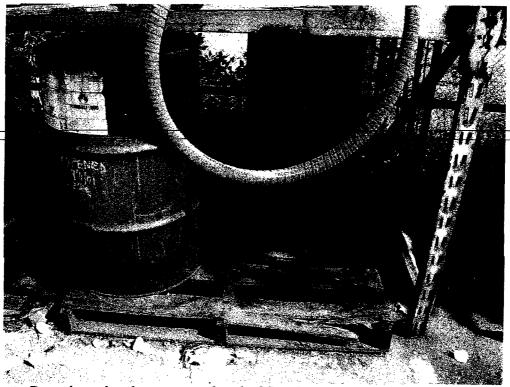


Figure 63: Drums located on the concrete pad north of Container Storage Area 11. Note the condition of the drums / rust.



Figure 14: Drums located on the concrete pad north of Container Storage Area 11. Note the condition of the drums / rust.



Figure 75: Drums located on the concrete pad north of Container Storage Area 11. Note the condition of the drums / rust.



Figure 86: Leaking drum (second from right in Figure 4).

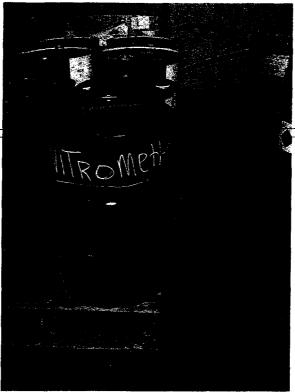


Figure 97: Facility representatives stated that contents of leaking drum were transferred to a new container and placed inside the facility building.



Figure 108: Location where drum was observed to be leaking.

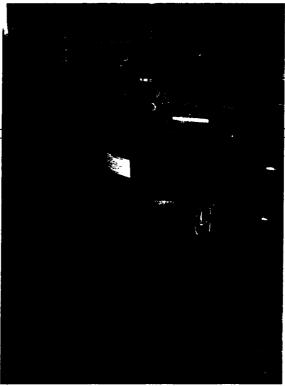


Figure 119: Drums that were located on the concrete pad north of Container Storage Area were pl



Figure 20: Close-up of label.

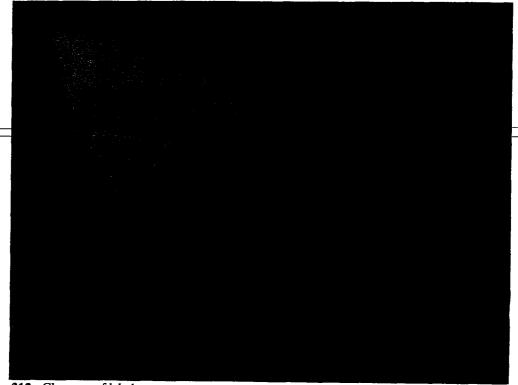


Figure 212: Close-up of label.

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	A. Received by (Please Print Clearly)  G. Signature  Agent  Addresse
Article Addressed to:	D. Is // ery address different from item 1?  Yes enter delivery address below:  No
Manager	3uite 410
Mr. David Craig, Manager Mr. David Craig, Manager Corporation Highway, Onetrex Northwestern 48075	Suite A10  Insured Mail  Express Mail  Express Mail  C.O.D.
Mr. David Craig, Manager  Mr. David Craig, Manager  Mr. David Craig, Manager  Mr. David Craig, Manager  A8075  Detrex Corporation  A8075  Detrex Northwestern 48075  24907 Northwestern 48075  2500thfield, Michigan 7001 0320	And Express Mail    Registered   Receipt for Merchandis   C.O.D.

•

#### STATE OF MICHIGAN



## JOHN ENGLER, Governor

REPLY TO:

WASTE MANAGEMENT DIVISION PO BOX 30241 LANSING MI 48909-7741

# DEPARTMENT OF ENVIRONMENTAL QUALITY "Better Service for a Better Environment"

"Better Service for a Better Environment" HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48909-7973

INTERNET: www.deq.state.mi.us RUSSELL J. HARDING, Director

September 25, 1998

Mr. Robert Currie General Counsel and Secretary Detrex Corporation P.O. Box 5111 Southfield, Michigan 48086-5111

Dear Mr. Currie:

SUBJECT: Detrex Corporation

**Consent Order** 

Enclosed please find a fully executed original of the Consent Order between Detrex Corporation and the Department of Environmental Quality (DEQ). The Consent Order became effective September 24, 1998, the date of the Chief of the Waste Management Division's signature.

Thank you for your cooperation in this matter.

Sincerely,

Rick D. Rusz

**Enforcement Section** 

**Waste Management Division** 

517-335-4709

**Enclosure** 

cc: Ms. JoAnn Merrick, DEQ

cc/enc: Ms. Zetta West, U.S. Environmental Protection Agency

Mr. Todd Adams, DAG

Dr. Ben Okwumabua/Mr. Larry AuBuchon, DEQ-Southeast Michigan

Ms. Evah Cole, DEQ

Ms. Jeanette Noechel, DEQ-Detroit

# STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY WASTE MANAGEMENT DIVISION

In the matter of administrative proceedings against Detrex Corporation, a corporation organized under the laws of the State of Michigan and doing business at 12886 Eaton Avenue, City of Detroit, County of Wayne, State of Michigan

WMD Order No. 111-09-98

Facility I.D. No. MID 092 605 972

#### CONSENT ORDER

This proceeding results from allegations specified in a Notice of Violation ("NOV") issued on April 22, 1998, by the staff of the Department of Environmental Quality ("DEQ"). The DEQ alleges that the Detrex Corporation ("Detrex"), a Michigan corporation, doing business at 12886 Eaton Avenue, City of Detroit, County of Wayne, Michigan, is in violation of Part 111, Hazardous Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended ("NREPA"), MCL 324.101, et seq.; and the administrative rules promulgated under Part 111. Detrex and the DEQ agree to resolve the alleged violations set forth in the NOV by entry of this Consent Order.

#### I. STIPULATIONS

Detrex and the DEQ stipulate as follows:

- 1.1 Pursuant to its authority under Section 105 and Part 111 of the NREPA, the DEQ has promulgated administrative rules pertinent to the identification, generation, treatment, storage, disposal, and transportation of hazardous wastes in Michigan. These rules are set forth in the <a href="Michigan Administrative Code">Michigan Administrative Code</a> ("MAC"), R 299.9101 R 299.11107.
- 1.2 On October 30, 1986, the State of Michigan was granted final authorization by the Administrator of the U.S. Environmental Protection Agency ("U.S. EPA"), pursuant to Section 3006(b) of the Resource Conservation and Recovery Act ("RCRA"). 42 U.S.C. Section 6926(b), to administer a hazardous waste program in Michigan in lieu of the federal program, 40 CFR Part 272, Subpart X, 51 Federal Register 36804 (October 16, 1986), as updated by 54 Federal Register 7420 (February 21, 1989), by 54 Federal Register 48608 (November 24, 1989), as updated by 55 Federal Register 18112 (May 1, 1990), by 56 Federal Register 18517 (April 23, 1991), as updated by 57 Federal Register 3724 (January 31, 1992), by 58 Federal Register 51244 (October 1, 1993), by 60 Federal Register 3095 (January 13, 1995), by 61 Federal Register 4742 (February 8, 1996), and by 62 Federal Register 61175 (November 14, 1997). Section 3008 of the RCRA, 42 U.S.C. Section 6928, provides that the U.S. EPA may enforce state regulations in those states authorized to administer a hazardous waste program.

- 1.3 Detrex is a person as defined by Section 301(g) of the NREPA and R 299.9106(i).
  Detrex owns and operates a facility at 12886 Eaton Avenue, Detroit, Michigan,
  that stores hazardous waste ("Facility"). Detrex is a Michigan corporation.
- 1.4 On November 18, 1980, Detrex filed a notification of hazardous waste activity for the Facility with the U.S. EPA pursuant to Section 3010 of the RCRA for its hazardous waste storage activities. Detrex's Facility I.D. No. is MID 092 605 972.
- 1.5 On June 29, 1992, the Department of Natural Resources, predecessor to the DEQ, issued Detrex's Solvents and Environmental Services Division an operating license ("Operating License"), pursuant to Section 324.11123 of the NREPA, authorizing the operation of a hazardous waste storage facility. The Operating License was modified by the DEQ on February 7, 1996.
- 1.6 The Director of the DEQ is authorized by Section 11151(1) of Part 111 of the NREPA to issue orders to comply. Accordingly, the Director has authority to issue and enter into this Consent Order to comply by consent with Detrex.
- 1.7 Detrex stipulates that the issuance and entry of this Consent Order is proper and acceptable. This Consent Order shall be considered a final order of the DEQ and shall become effective on the date it is signed by the Chief of the Waste Management Division ("WMD"), designee of the Director, pursuant to Section 301(b) of the NREPA.

- 1.8 Detrex agrees to fully and strictly comply with all provisions of Part 111 of the NREPA, the administrative rules promulgated pursuant to Part 111, and all other applicable state and federal statutes.
- 1.9 Detrex and the DEQ agree that the signing of this Consent Order is for settlement purposes only and does not constitute an admission by Detrex of the allegations contained in the NOV or that the law has been violated.

## II. COMPLIANCE PROGRAM

- 2.1 Detrex shall achieve compliance with the requirements specified below in accordance with the following schedule:
  - a. On and after the effective date of this Consent Order, Detrex shall properly characterize hazardous waste accepted for storage at the Facility in accordance with R 299.9302 and the Facility's Operating License and Waste Analysis Plan.
  - b. On and after the effective date of this Consent Order, Detrex shall review
     the generator's past analyses and the Generator Waste Material Profile
     Report prior to accepting the waste at the Facility.

- c. On and after the effective date of this Consent Order, Detrex shall write the appropriate hazardous waste numbers on manifests prepared by Detrex in accordance with R 299.9304(2).
- d. On and after the effective date of this Consent Order, Detrex shall write the appropriate hazardous waste numbers on Land Disposal Restriction Forms prepared by Detrex in accordance with R 299.9311(1) and 40 CFR 268.7(a)(1)(i).
- e. On and after the effective date of this Consent Order, Detrex shall perform all waste screening tests in accordance with Condition II.C of the Facility's Operating License and Waste Analysis Plan.
- f. On and after the effective date of this Consent Order, Detrex shall only store hazardous wastes in those areas authorized by the Facility's Operating License.
- g. On and after the effective date of this Consent Order, Detrex shall only store hazardous wastes at the Facility that are listed in the Facility's Operating License.

#### III. REPORTING

3.1 Detrex shall verbally report any violation(s) of the terms and conditions of this

Consent Order to the Southeast Michigan District Supervisor of the DEQ's WMD

by no later than the close of the next business day following detection of such

violation(s) and shall follow such notification with a written report within five (5)

business days following detection of such violation(s). The written report shall

include a detailed description of the violation(s), as well as a description of any

actions proposed or taken to correct the violation(s). Detrex shall report any

anticipated violation(s) of this Consent Order to the above-referenced individual in

advance of the relevant deadlines whenever possible.

#### IV. RETENTION OF RECORDS

4.1 Upon request by an authorized representative of the DEQ, Detrex shall make available to the DEQ all records, plans, logs, and other documents required to be maintained under this Consent Order or pursuant to Part 111 of the NREPA or its administrative rules. All such documents shall be retained at the Facility for at least a period of three (3) years from the date of generation of the record unless a longer period of record retention is required by Part 111, the RCRA, or their rules.

#### V. RIGHT OF ENTRY

5.1 Detrex shall allow any authorized representative or contractor of the DEQ, upon presentation of proper credentials, to enter upon the premises of the Facility at all reasonable times for the purpose of monitoring compliance with the provisions of this Consent Order. This paragraph in no way limits the authority of the DEQ to conduct tests and inspections pursuant to the NREPA, its rules, or any other applicable statutory provision.

#### VI. FINES, COSTS, AND PENALTIES

- 6.1 By September 30, 1998, Detrex shall pay the sum of \$30,000 to the State of Michigan in settlement of the DEQ's claim for civil fines arising from the violations alleged in the NOV.
- 6.2 By September 30, 1998, Detrex shall pay to the State of Michigan the sum of \$3,250 in settlement of claims for the costs of surveillance and enforcement arising from the violations alleged in the NOV.
- 6.3 For each failure to comply with the provisions of Section II of this Consent Order,
  Detrex shall pay stipulated penalties of \$1,500 per violation per day for one (1) to
  seven (7) days of violation; \$2,000 per violation per day for eight (8) to fourteen

  (14) days of violation; and \$2,500 per violation per day for each day of violation

thereafter. For each failure to comply with any other provisions of this Consent Order, Detrex shall pay stipulated penalties of \$500 per violation per day for each day of violation. Stipulated penalties shall be paid within thirty (30) days after written demand made by the DEQ.

- 6.4 To ensure timely payment of the above civil fine, penalties, and costs, Detrex shall pay an interest penalty to the General Fund of the State of Michigan each time it fails to make a complete or timely payment. This interest penalty shall be based on the rate set forth at MCL 600.6013(b), using the full increment of amount due as principal, and calculated from the due date for the payment until the delinquent payment is finally made in full.
- 6.5 Detrex shall pay the above civil fine and costs by certified or cashier's check made payable to the "State of Michigan" and mailed to the DEQ, Revenue Control Unit, P.O. Box 30657, Lansing, Michigan, 48909-8157. To ensure proper credit, all payments made pursuant to this Consent Order must include the Payment Identification Number WMD 3030.
- 6.6 Detrex agrees not to contest the legality of the civil fine or costs for surveillance and enforcement paid pursuant to Paragraphs 6.1 and 6.2, above. Detrex further agrees not to contest the legality of any stipulated penalties or interest penalties assessed pursuant to Paragraphs 6.3 and 6.4, above, but reserves the right to

dispute the factual basis upon which a demand by the DEQ for stipulated penalties or interest penalties is made.

#### VII. DISPUTE RESOLUTION

- 7.1 The dispute resolution procedures of this Section shall be the exclusive mechanism to resolve disputes arising under this Consent Order and shall apply to all provisions of this Consent Order. Any dispute that arises under this Consent Order shall, in the first instance, be the subject of informal negotiations between the parties. The period of negotiations shall not exceed ten (10) days from the date of written notice by any party that a dispute has arisen, but it may be extended by an agreement of the parties. The period for informal negotiations shall end when the DEQ provides a written statement setting forth its proposed resolution of the dispute to Detrex.
- 7.2 If the parties fail to resolve a dispute by informal negotiations, then the dispute shall be resolved in accordance with the resolution proposed by the DEQ unless, within ten (10) days after receipt of the DEQ's proposed resolution, Detrex files a petition with a court of competent jurisdiction setting forth the matter in dispute, the efforts made by the parties to resolve it, the relief requested, and the schedule, if any, within which the dispute must be resolved to ensure orderly implementation of this Consent Order. Any judicial review shall be limited to the

administrative record. In proceedings on any dispute, Detrex shall bear the burden of persuasion on factual issues.

- 7.3 The filing of a petition for resolution of a dispute with this Court shall not of itself extend or postpone any obligation of Detrex under this Consent Order.

  Notwithstanding the invocation of the dispute resolution, stipulated penalties, with any applicable interest, shall accrue from the first day of any failure or refusal to comply with any term or condition of this Consent Order. In the event, and to the extent that Detrex does not prevail on the disputed issue, stipulated penalties and any applicable interest shall be paid within ten (10) calendar days in the manner provided for in Paragraph 6.5 of this Consent Order. Detrex shall not be assessed stipulated penalties for disputes resolved in its favor.
- 7.4 Notwithstanding this Section, Detrex shall pay that portion of a demand for reimbursement of costs or payment of stipulated penalties that is not subject to good faith resolution in accordance with and in the manner provided in Paragraph 6.5 of this Consent Order.

## VIII. FORCE MAJEURE

8.1 Detrex shall perform the requirements of this Consent Order within the time limits established herein, unless performance is prevented or delayed by events which constitute a "Force Majeure." Any delay in the performance attributable to a

- "Force Majeure" shall not be deemed a violation of Detrex's obligations under this Consent Order in accordance with this Section.
- 8.2 For the purpose of this Consent Order, "Force Majeure" means an occurrence or non-occurrence arising from causes not foreseeable, beyond the control of, and without the fault of Detrex, such as: an Act of God, untimely review of permit applications or submissions by the DEQ or other applicable authority, and acts or omissions of third parties that could not have been avoided or overcome by Detrex's diligence and that delay the performance of an obligation under this Consent Order. "Force Majeure" does not include, among other things, unanticipated or increased costs, changed financial circumstances, or failure to obtain a permit or license as a result of Detrex's actions or omissions.
- 8.3 Detrex shall notify the DEQ, by telephone, within forty-eight (48) hours of discovering any event which causes a delay in its compliance with any provision of this Consent Order. Verbal notice shall be followed by written notice within ten (10) calendar days and shall describe in detail the anticipated length of delay, the precise cause or causes of delay, the measures taken by Detrex to prevent or minimize the delay, and the timetable by which those measures shall be implemented. Detrex shall adopt all reasonable measures to avoid or minimize any such delay.

- 8.4 Failure of Detrex to comply with the notice requirements of Paragraph 8.3, above, shall render this Section VIII void and of no force and effect as to the particular incident involved. The DEQ may, at its sole discretion and in appropriate circumstances, waive the notice requirements of Paragraph 8.3.
- 8.5 If the parties agree that the delay or anticipated delay was beyond the control of Detrex, this may be so stipulated and the parties to this Consent Order may agree upon an appropriate modification of this Consent Order. If the parties to this Consent Order are unable to reach such agreement, the dispute shall be resolved in accordance with Section VII (Dispute Resolution) of this Consent Order. The burden of proving that any delay was beyond the reasonable control of Detrex, and that all the requirements of this Section VIII have been met by Detrex, is on Detrex.
- 8.6 An extension of one compliance date based upon a particular incident does not necessarily mean that Detrex qualifies for an extension of a subsequent compliance date without providing proof regarding each incremental step or other requirement for which an extension is sought.

## IX. GENERAL PROVISIONS

9.1 With respect to any violations not specifically addressed and resolved by this

Consent Order, the DEQ reserves the right to pursue any other remedies to which

they are entitled for any failure on the part of Detrex to comply with the requirements of the NREPA and its rules.

- 9.2 Notwithstanding any other provision of this Consent Order, an enforcement action may be brought by the DEQ pursuant to Part 111 of the NREPA or other statutory authority where the generation, storage, transportation, treatment, or disposal of hazardous waste at the Detrex Facility may present an imminent and substantial hazard to the health of persons or to the natural resources or is endangering or causing damage to the public health or the environment.
- 9.3 The DEQ and Detrex consent to enforcement of this Consent Order in the same manner and by the same procedures for all final orders entered pursuant to Part 111, MCL 324.11101 et seq.
- 9.4 This Consent Order in no way affects Detrex's responsibility to comply with any other applicable state, federal, or local laws or regulations, including, without limitation, any corrective action or similar requirements applicable to the Facility pursuant to Part 111, the RCRA, and their rules.
- 9.5 Nothing in this Consent Order is or shall be considered to affect any liability

  Detrex may have for natural resource damages caused by Detrex's ownership

  and/or operation of the Facility. The State of Michigan does not waive any rights
  to bring an appropriate action to recover such damages to the natural resources.

9.6 The provisions of this Consent Order shall apply to and be binding upon the parties to this action, their officers, agents, servants, employees, successors and assigns, and on those persons in active concert or participation with them who receive actual notice of the Consent Order prior to its termination. Detrex shall give notice of this Consent Order to any prospective successor in interest prior to transfer of ownership and shall notify the DEQ of such proposed sale or transfer.

#### X. TERMINATION

- 10.1 This Consent Order shall remain in full force and effect until expressly terminated by a written Notice of Termination issued by the Chief of the WMD. Detrex may request that the Chief issue a written Notice of Termination at any time after achieving compliance with this Consent Order. Such a request shall consist of a written certification that Detrex has fully complied with all of the requirements of this Consent Order and payment of any fines and penalties required in this Consent Order. Specifically, this certification shall include:
  - a. the date of compliance with each provision of the compliance program in
     Section III and the date any fines or penalties were paid;
  - a statement that all required information has been reported to the District
     Supervisor; and

c. confirmation that all records required to be maintained pursuant to this
 Consent Order are being maintained at the Facility.

Additional relevant information may also be requested by the Chief of the WMD.

## **Signatories**

The undersigned CERTIFY they are fully authorized by the party they represent to enter into this Consent Order to comply by consent and to EXECUTE and LEGALLY BIND that party to it.

DETREX CORPORATION
By: Notatu. Curici
Title: Feneral Coursel & Secretary
Date: 9-18-98

**DEPARTMENT OF ENVIRONMENTAL QUALITY** 

Russell J. Harding

Director

By: Jim Sygo Chief

Waste Management Division

Date: 9/24/98

Approved as to Form:

Frank J. Kelley Attorney General

Todd Adams
Assistant Attorney General
Natural Resources Division
3rd Floor, Knapps Centre

Lansing, Michigan 48933

Date: 23 50098





P.O. BOX 5111 • SOUTHFIELD, MI 48086-5111 • (810) 358-5800 • FAX (810) 358-5803

January 23, 1996

#### VIA FEDERAL EXPRESS

United States Environmental Protection Agency Region 5 Enforcement and Compliance Assurance Branch 77 West Jackson Blvd. Chicago, IL 60604

Attention: Ann E. Kerbs (DRE-8J)

Dear Ms. Kerbs:

In reply to your letter dated December 14, 1995, with reference to:

SWDA \ 3007 Information Request Detrex Chemical Industries, Inc. Detroit, Michigan MID 091 605 972

- Water is not used in any analytical testing procedures at the plant. The only time water is used is to rinse the electronic pH probe and the source of that water is Arbor Springs Water Company. It is distilled water. A typical lab analysis report is enclosed. It was faxed to us January 10, 1996. The lab report was dated October 31, 1994. We will contact the company to get an up-dated lab analysis.
- The method we use is exposure to heat and flame. While duplicate analysis are performed at the facility, documentation has not been kept in the regular course of business. We have developed the attached (Exhibit 1) Standard Operating Procedure to address the recordkeeping of duplicate analysis in the future.
- Item 3). This correspondence shall serve to verify that Pensky-Marten apparatus is used to determine the flash point of samples that test positive for ignitability by exposure to heat and flame. The facility does not currently perform quality control checks, however, we have developed the attached (Exhibit 2) Standard Operating Procedure to address quality control issues in the future. We have purchased a calibration fluid with a known flash point to perform quality control analysis. We have also purchased a calibrating thermometer to standardize the thermometer used in the Pensky-Marten flash point test. The Standard

Operating Procedure we developed to test the thermometer used in the Pensky-Marten test is attached (Exhibit 3).

- Item 4). We have attached (Exhibit 4) the specific gravity procedure which is described in the section of our permit known as Attachment C-3 of the Waste Analysis Plan. With regard to the frequency of duplicate analysis, our permit indicates that the procedure for determining specific gravity is for screening purposes only and no substantial quality control is required. Accordingly, we have no documentation regarding the frequency of duplicate analysis. (See permit attachment C-3, paragraph 8.0).
- ltem 5). With regard to the first four documentation requests, please see the attached (Exhibit 5). With regard to the fifth request for frequency of duplicate analysis, the facility does not have a predetermined frequency, however, they are performed when needed.
- Item 6). There is an electronic pH meter on site at the facility which is not currently in an operating condition, and therefore, during its period of inoperability, the facility has been using indicator paper to determine pH. The facility is in the process of repair and/or replacement of the electronic pH meter. Relative to the issue of frequency of duplication, it is done as needed.

If this submittal should raise any questions for which you request additional information, please feel free to contact David Craig, Corporate Manager of Environmental and Safety Compliance, Detrex Corporation Headquarters at (810) 358-5800.

I certify under penalty of law that I have personally examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relative documents and inquiry of those individuals immediately responsible for providing all relative information and documents, I believe that the information submitted is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Very truly yours,

Robert M. Currie

General Counsel & Secretary

Wolceta Cum'

Subscribed and sworn to before me

this <u>23<sup>rd</sup> day of <u>January</u>, 1996</u>

Beverly J. Burns

Duerly <

Notary Public, Oakland County, MI

My Commission expires: February 1, 1997

If you have any questions regarding this matter, please contact Ann E. Kerbs, at (312) 886-3901. Your response should be sent to the United States Environmental Protection Agency, Region 5, Enforcement and Compliance Assurance Branch, 77 West Jackson Boulevard, Chicago, Illinois 60604, Attention: Ann E. Kerbs (DRE-8J).

Sincerely yours,

Joseph M. Boyle, Chief

Enforcement and Compliance Assurance Branch

Waste Pesticides and Toxics Division

**Enclosure** 

cc: Jan Sealock, MDEQ

Candace D. Friday, PRC Senior QA Chemist



#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

#### REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

DEC 1 4 1995

REPLY TO THE ATTENTION OF: DRE-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
Mr. Ron Hritzkowin
Detrex Chemical Industries Inc.
12886 Eaton Avenue
Detroit, Michigan 48227

Re: SWDA § 3007 Information Request Detrex Chemical Industries Inc. Detroit, Michigan

MID 091 605 972

Dear Mr. Hritzkowin:

This is a request for information by the United States Environmental Protection Agency (U.S. EPA) pursuant to its authority under Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. §6927. The information requested is necessary to complete a RCRA Compliance Evaluation Inspection of your facility that was performed by designated representatives of the U.S. EPA on May 17, 1995.

The written statements submitted pursuant to this request must be notarized and submitted under an authorized signature certifying that all statements contained therein are true and accurate to the best of the signatory's knowledge or belief. The information requested herein must be provided to this office within thirty (30) days of receipt of this letter.

Should the signatory find, at any time after the submittal of the requested information, that any portion of the submitted information is false, the signatory should notify Region 5. If any answer certified as true should be found to be untrue or misleading, the signatory may be prosecuted pursuant to 18 U.S.C. §1001. The U.S. EPA has the authority to use the information requested herein in an administrative, civil or criminal action.

You may, pursuant to Title 40 of the Code of Federal Regulations (40 CFR) 2.203 (a), assert a business confidentiality claim covering all or part of the information in the manner described in 40 CFR 2.203(b). Information covered by such a claim will be disclosed by the U.S. EPA only to the extent and by the means of the procedures set forth in 40 CFR Part 2, Subpart B. Any request for confidentiality must be made when the information is submitted, since any information not so identified may be made available to the public without further notice.

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5

IN THE MATTER OF:

DETREX CHEMICAL INDUSTRIES, INC.	) Information Request Pursuant
12886 EATON AVENUE	) to Section 3007 of the Resource
DETROIT, MI 48227	) Conservation and Recovery Act,
	) as amended, 42 U.S.C. §6927
EPA ID NO.: MID 091 605 972	;

This is a request by the United States Environmental Protection Agency (U.S. EPA) issued pursuant to Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. §6927. The issuance of this request serves to require Detrex Chemical Industries Inc. to submit information relating to activities conducted pursuant to its hazardous waste management activities.

The State of Michigan is authorized to administer and enforce a hazardous waste management program in lieu of the Federal program under subtitle C of RCRA, 42 U.S.C 6921 et. seq. subject to the Hazardous and Solid Waste Amendments of 1984 (HSWA), November 8, 1984, 42 U.S.C. §6926(c) and (g). The State's program, as administered by the Michigan Department of Natural Resources, was approved by U.S. EPA pursuant to 42 U.S.C. §6926(b) and 40 CFR Part 271. U.S. EPA's approval of Michigan's base program was effective on October 30, 1986 (51 FR 36804). Michigan has primary responsibility for enforcing its hazardous waste program. However, U.S. EPA retains the authority to exercise its enforcement authorities under Sections 3007, 3008, 3013, and 7003 of RCRA, 42 U.S.C §§6927, 6928, 6934, and 6973, as well as under other Federal laws and regulations.

#### I. <u>INSTRUCTIONS</u>

This request for information pertains to any and all information you have responsive to questions presented in this request for the Detrex Chemical

Industries, Inc., located in Detroit, Michigan. This request shall require the production of all information called for in as detailed a manner as possible based upon such information as is available or accessible, including, where specific information is not available or accessible, an explanation of the method by which each answer is determined.

The information must be provided notwithstanding its possible characterization as confidential information or trade secrets. You are entitled to assert a claim of confidentiality pursuant to Title 40 of the Code of Federal Regulations (40 CFR) 2.203(b) for any information produced that, if disclosed to persons other than officers, employees, or duly authorized representatives of the United States, would divulge information entitled to protection as trade secrets. Any information which the Administrator of this Agency determines to constitute methods, processes or other business information entitled to protection as trade secrets will be maintained as confidential pursuant to the procedures set forth in 40 CFR Part 2, Subpart B. A request for confidential treatment must be made when the information is provided, since any information not so identified will not be accorded this protection by the Agency. Any such confidentiality request must specifically indicate which items, documents and/or information are claimed as confidential, and must provide a detailed explanation supporting specifically each indicated item, document and/or information.

The information submitted pursuant to this request must be notarized and returned under an authorized signature certifying that all statements contained therein are true and accurate to the best of the signatory's knowledge and belief. The information requested herein must be provided to this office within 30 days of receipt of this letter. Should the signatory find at any time after submittal of

the requested information that any portion of this submittal certified as true is false or misleading, the signatory should notify U.S. EPA, Region 5, promptly. If any information submitted under this information request is found to be untrue or misleading, the signatory may be prosecuted under Section 1001 of Title 18 of the United States Code. U.S. EPA has the authority to use the information requested herein in an administrative, civil or criminal action.

#### II. DEFINITIONS

- "Document" means all written, typewritten, drawn or printed materials including but not limited to correspondence, letters, agreements, contracts, drawings, memoranda, blueprints, manifests, logs, invoices and photographs, and all information recorded on electronic or magnetic media.
- 2. "Hazardous waste" means a hazardous waste as defined in 40 CFR 261.3, (40 CFR 260.10).
- 3. "Ignitability" means a characteristic of a solid waste that classifies the waste as hazardous, as defined in 40 CFR 261.21.
- 4. "Waste Analysis Plan" means the written document which describes the procedures that will be used to comply with 40 CFR 264.13.

#### III. REQUEST FOR ANSWERS TO QUESTIONS AND THE PRODUCTION OF DOCUMENTS

Detrex Chemical Industries Inc. shall provide all documents as necessary to answer the following information requests:

- Describe the source of demineralized and distilled water available for laboratory use and provide documentation of the water (for example, conductivity checks or organic analysis).
- Method ASTM D4982-89 listed in the waste analysis plan provides two
  options to determine ignitability: (1) exposure to heat and flame and
  (2) exposure to a spark source. Describe the technique being used and

provide documentation regarding the frequency of duplicate analyses performed.

- 3. Verify whether the Pensky-Marten apparatus (Method 1010) is used to determine the flashpoint of samples. Describe the quality control (QC) checks used for the analysis, including, (1) checking the thermometer against a thermometer certified by the National Institute of Standards and Technology, (2) testing a calibration fluid regularly, and (3) performing duplicate analyses to determine laboratory precision. Provide documentation regarding the performance of these QC checks.
- 4. Provide a summary of the procedure used to determine specific gravity. Submittal of a current standard operating procedure is acceptable. Also provide documentation regarding the frequency of duplicate analyses.
- 5. Provide documentation for the following, for determining solvent content by gas chromatography (GC):
  - Calibration standard compounds, concentrations, and frequency of analysis (for initial and continuing calibrations)
  - Establishment of retention time windows for all analytes
  - Examples of a daily analytical run
  - Usage and recoveries of system monitoring compounds (surrogates) or internal standards
  - Frequency of duplicate analyses
- 6. Clarify whether pH is determined by electronic pH meter or indicator paper. The waste analysis plan indicates that pH is determined by Method 9040, which is an electrometric determination; however, a pH

meter was not found during the audit. Clarify which method is used for pH determination and provide the frequency of duplicate analyses.

7. Provide the following notarized certification by a responsible company officer:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiry of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

	i2 th		<b>Ú</b>	
Issued this		day of_	December	1995.

Joseph M. Boyle, Chief

Enforcement and Compliance Assurance Branch

Pesticides and Toxics Division

United States Environmental Protection Agency

Region 5

DUNS: 09-160-5972 EX CORPORATION

GOLD SHIELD SOLVENTS DIV

12886 EATON

DETROIT MI 48227

TEL: 313 491-4550

DATE PRINTED JUN 25 1991

RATING **BRANCH** 

WHOL CHEMICALS

SIC NO. 28 69

**EMPLOYS** 

BRANCH MANAGER: R SWAN

PAYMENTS REPORTED	(Amounts may PAYING RECORD	be rounded HIGH CREDIT	to nearest NOW OWES	figure PAST DUE	in prescribed SELLING TERMS	ranges) LAST SALE WITHIN
06/91	Ppt	100	-0-	-0-	N30	6-12 Mos
05/91	Ppt	20000	-o <i>-</i>	-0-		6-12 Mos
•	Ppt	2500	2500	-0-		1 Mo
	Ppt	1000	1000	-0-	N30	1 Mo
	Ppt	250	-0-	-0-	N30	6-12 Mos
	Ppt-Slow 30	250	250	100	N30	1 Mo
	Slow 30	25000	-0-	-0-		2-3 Mos
	Slow 30	250	100	100	N30	2-3 Mos
	(009)	1000	750	250	N30	1 Mo
04/91	Ppt	2500	2500	-0-		1 Mo
·	Ppt	250	-0-	-0-		2-3 Mos
	Ppt	50	-0-	-0-		4-5 Mos
	Ppt-Slow 30	1000	-0-	-0-	N30	6-12 Mos
	(014)	100	-0-	-0-		6-12 Mos
03/91	Ppt	750	250	-0-	N15	l Mo
·	Ppt	100	50	-0-	N15	l Mo
12/90	Ppt-Slow 60+	100	-0-	-0-		6-12 Mos
09/90	Ppt	1000	-0-	-0-		6-12 Mos
•	Ppt-Slow 10	2500	50	50		
07/90	Ppt	100	-0-	-0-		6-12 Mos
06/90	Ppt	750	-0-	-0-		6-12 Mos

This is a branch: headquarters are located at 4500 Town Center Suite 11, Southfield, MI. Headquarters D-U-N-S 00-531-7599. The manager does not have authority to purchase. Bills are paid generally from headquarters. This branch Operates as a sales sales office.

08/30/90

FACILITIES: Rents 1,500 sq. ft. on 1211 floor of brick building in good condition. Premises neat.

LOCATION: Central business section on main street.

06-25(6AO /013) 013 160

FULL DISPLAY COMPLETE



REX CORPORATION

CHEMICALS DIVISION • P. D. BOX 1398 • ASHTABULA, DHID 44004

TELEPHONE 216 997-6131

March 1, 1989

REGEIVED MAR 7 1989

RCRA PERMITTING BRANCH OR/WMD EPA, REGION V

Mr. Dave Petroski USEPA Region V 230 South Dearborn Street Chicago, Illinois 60604

Dear Mr. Petroski:

I am sorry for the delay in submitting the additional information you requested by telephone on February 13, 1989, but equipment starting service dates were more difficult to obtain than I anticipated. Tables 1 and 2 attached are a summary of the information you requested.

If you have any questions or require more information, please advise.

Sincerely,

DETREX CORPORATION

Charles Guy

Environmental Manager

bz

## TABLE 1

#### WASTE SOLVENT PROCESS EQUIPMENT

<u> 1.D.</u>	Year Installed	Equipment Name	Description
<b>J2.</b>	1986	DCI Feed Tank	2,300 gallon C.S. process tank equipped with a condensor unit and used for temporary storage of in-process F002 material prior to being processed by DCI still.
13.	1965	S-350 Still	Detrex Model S-350 and S-600 stills.
14.	1970	S-600 Still	Used for recovering F001 material from degreasing operations via distillation. These units can process approximately 2,000 gallons per day each.
<i>y</i> 5.	1983	DCI Still (Reinstalled in 1986 as replace- ment for I.D. No. 19)	DCI Model Dyna-1-100 Solvent Recovery Still. Used to recover F002 material from recovery of same via live steam injection. This unit can process approximately 800 gallons per day.
17:	1980	Bottoms Tank	5,000 gallon C.S. generator accumulation tank used for temporary storage of still bottoms from recovery of F002 material prior to off-site disposal (material is stored for less than 90 days).
19.	1985	Wiped Film Evaporator (Removed from service in Aug. of 1986).	Rodney Hunt Machine Co. Model MBI - 577575 Wiped Film Evaporator. Used for recovery of F001 material from degreasing operations. This unit can process approximately 2,400 gallons per day.
22.	1987	F001 Feed Tank	4,000 gallon C.S. process tank used for temporary storage of in-process F001 material prior to being processed by Detrex stills.
<i>_2</i> 3.	1980	Decant Tank	1,500 gallon C.S. generator accumulation tank used for collection of process waste water.
24.	1986	DCI Still	DCI Model Dyna-1-500 Solvent Recovery Still. Used to recover F002 material from recovery of same via live steam injection. This unit can process approximately 500 gallons per hour.

#### TABLE 2

## RECLAIM SOLVENT PROCESS EQUIPMENT

<u>I.D.</u>	Year Installed	Equipment Name	<u>Description</u>
10.	1985	Solvent Receiver Tank	750 gallon reclaim solvent receiver tank for product. All recovered solvent from the 4 stills discharge into this tank.
16.	1965 (replaced) 1987	Drying Columns	Desicant drying columns for removal of residual water from reclaim solvent.
20.	1985	Stabilizer Mix Tank	2500 gallon SS tank with agitator and addition pump for adding stabilizer chemicals to reclaim solvent.

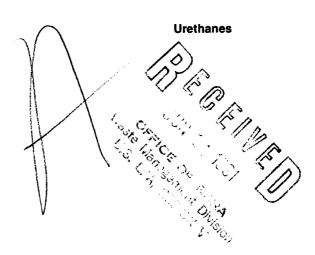
**BASF** 

MID 091605972

June 5, 1991

Regional Administrator
USEPA Region V
Attn.: RCRA Activities
230 South Dearborn Street
Chicago, IL 60604

Subject: Exception Report



Dear Sir or Madam:

In accordance with the requirements of 40 CFR 262.42, the following Exception Report is submitted.

A hazardous waste shipment recorded on manifests INA 0478262 and INA 0478258 was sent to Industrial Fuels and Rescurces in Indiana on March 26, 1991. The transporter, Gold Shield Solvents (Detrex), was contacted on May 7, 1991 (42 days after the shipment) concerning the missing Generator Second Copy of the two above referenced manifests. Gold Shield gave assurances that the shipment was delivered and that IFR would mail the manifest copies that day. The copies of the manifests were received by BASF on May 13, 1991, 48 days after the shipment.

Although delivery and disposal of the consignment were eventually confirmed, legible copies of the manifests are attached for your information. If there are any questions regarding this report, please contact Karen LeMieux at (313) 591-5584.

Regards,

M./J. Foley

Production Manager

kal

attachments

cc: Michigan DNR, Hazardous Waste Division BASF Midwest Ecology



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF SOLID AND HAZARDOUS WASTE MANAGEMENT P.O. Box 7035 Indianapolis, IN 46207-7035 Received 9/

UNIFORM HAZARDOUS  VASTE MANIFEST  1. Generator's US EPA ID No.  M.I.D. 9.8.1.1.9.4.2.6.9					039. Expires 9-30-
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Generator's Phone ( 313) 591-6200	<del></del>	<u>_</u>			
. Transporter 1 Company Name 6. Use EPA ID Numb			C. State Transporter's		
Gold Shield Solvents M. I. D. O. 9.1.  7. Transporter 2 Company Name 8. Use EPA ID Numb	6 · 0 · 5 · 9 · ;	/ · 2   L	). Transporter's Phone . State Transporter's	313/	491-4550
Chemical Services Corp. I.L.D.9.8.0.	5.9.0.9.4		. Transporter's Phone		597-3380
D. Designated Facility Name and Site Address 10. Use EPA ID Number			G. State Facility's ID		
Industrial Fuels & Resources	٠				
6045 South Scott		. F	I. Facility's Phone		
South Bend, IN 46625 [1.N.D.9.8.0.]			(219) 234-0	0441	
1. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Con	tainers	13. Total	14. Unit	Vaste No.
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If unable to process, return to generator.					
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EPA Form 8700-22 Previous editions are obsolete. State Form 11865 (R/4-89)

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF SOLID AND HAZARDOUS WASTE MANAGEMENT

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// Indianapolis, IN 46207-7035			5	<i></i>	•
PLEASE PRINT OR TYPE (Form designed for use on	elite (12-pitch) typewrit	ter.) Fo	rm Approved. OMB No.	. 2050-00	39. Expires 9-30-91
UNIFORM HAZARDOUS 1.1. Generator's US EPA	ID No.	Manifest		ı	
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Gold Shield Solvents M.I	D .0 .9 .1 .6 .0	5 9.7 2	D. Transporter's Phone	313//	491-4550
7. Transporter 2 Company Name 8.	Use EPA ID Number		E. State Transporter's	ID	***************************************
	D98059	0947	F. Transporter's Phone	708/5	97-3380
49	Use EPA ID Number .	11	G. State Facility's ID		*
Industrial Fuels & Resources		į		4	
6045 S. Scott		1	H. Facility's Phone		
South Bend, IN 46625	D 9 8 0 5 9	0947	(219) 234-	-0441	· 1
11. US DOT Description (Including Proper Shipping Name, Hazard Class,	and ID Number	12. Container	s 13. Total	14. Unit	I. Waste No.
11. 00 DOT Description (including Proper Shipping Warre, Plazard Class	, and ib Number,	No. Typ		Wt/Vol.	vvaste No.
Waste Toluene Diisocyanate, Poison B,	UN2078,		25		
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rags, filters, glass jars, etc.)		0.1.4p	$\mathbf{x}$ .2.7.1.2	P	U223
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C. Waste Methyl Alcohol, Flammable Liquid	d, UN1230,				
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Toluene, Acetone, Methylene Chloride)		O.O.1 D.	M =5.5	G	F003
d. Waste Toluene Diisocyanate, Poison B,					
R.Q., (Waste Oil Containing Isocyanat			,	] ]	
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\ a £120	A HAZAW TARA	Ran Ract	rintinta (A)	11:1FR 7	hX_//
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16. Special Handling Instructions and Additional Information	70 D V4		1 000 024 02	ann.	1
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If unable to process, return to gener	ator.				
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according to applicable international and national government regu	ulations.				
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M. J. Foley - Rep. of BASF Corp.	Miller	mun	7 100	<del>7_b</del>	3 2 6 9 1
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19. Discrepancy Indication Space					`
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•					:

EPA Form 8700-22 Previous editions are obsolete. State Form 11865 (R/4-89)

20. Facility

Signature

nanifest except as noted Item

Month D 03/2

Day

Year F

Owner or Operator: Certification of receipt of hazardous materials covered by this

## MAR 14 1991

#371-346,098

5HR-13

# CERTIFIED MAIL RETURN RECEIPT REQUESTED

Issa Shamiyeh, Director Risk Management Gold Shield Solvents, Division of Detrex Corporation P.O. Box 5111 Southfield, Michigan 48086-5111

Re: Consent Agreement and Final

Order

Gold Shield Solvents

Division of Detrex Corporation Docket No.: V-W-90-R-028

Dear Mr. Shamiyeh:

This letter is to acknowledge receipt of the Consent Agreement and Final Order signed by yourself on behalf of Gold Shield Solvents, Division of Detrex Corporation. A fully executed copy of the Consent Agreement and Final Order is enclosed for your files.

Your cooperation in resolving this matter is appreciated. Sincerely yours,

William E. Muno, Associate Director Office of RCRA

cc: Alan Howard, MDNR

bcc: Robert Small, OWPE, OS-520

Glenn Sternard, 5HR-12 Nick Bollo, 5CS-TUB-3

Jean Sharp, 5HR-13 ✓

Regional Hearing Clerk, 5MF-14'

MI Permit Section, 5HR-13

d F

J. M. William



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5 230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

Wm. E. Mysus

5HR-13

# **MEMORANDUM**

SUBJECT:

CAFO for Execution for Gold Shield Solvents

Docket Number V-W-90-R-028

FROM:

William E. Muno, Associate Director

Office of RCRA

TO:

David A. Ullrich, Director

Waste Management Division

Attached for your review and signature is a Consent Agreement and Final Order (CAFO), the terms of which require Gold Shield Solvents, Division of Detrex Corporation to comply with the requirements regarding the export of hazardous waste contained in the Michigan Administrative Code r 299.9309 (40 CFR 262 Subpart E).

The Respondent is assessed a civil penalty of \$9,500.00. No reductions were granted for violations of the RCRA hazardous waste export requirements which were cited in the complaint. I recommend that you sign the Order on behalf of Region V. When execution of signatures is complete please return the signed CAFO to William E. Muno, Associate Director, Office of RCRA, for proper distribution of the signed copies.

Attachment

# <u>MEMORANDUM</u>

SUBJECT: CAFO for Execution for Gold Shield Solvents

Docket Number V-W-90-R-028

FROM: William E. Muno, Associate Director

Office of RCRA

TO: David A. Ullrich, Director

Waste Management Division

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Attachment

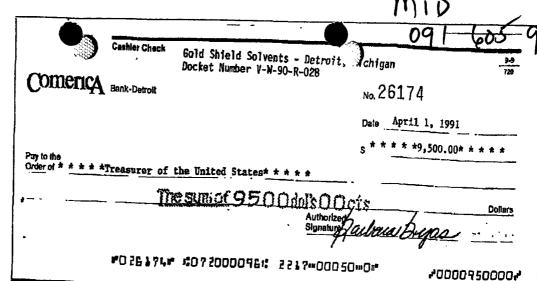
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CHECK AMOUNT 9,500.00

M # 315



Regional Hearing Clerk Planning and Management Division United States Environmental Protection Agency Region 5 A Region V 230 South Dearborn Street Finance & Accounting Dearborn Street Chicago, Illinois 60604 (h. ) : 40, [1] 11no18 60604 Attention: 5MF-14

Consent Agreement and Final Order Gold Shield Solvents Division of Detrex Corporation Docket No. V-W-90-R-028

Dear Ms. Shorty:

Enclosed is a cashier's check for \$9,500. It is in full payment and in full compliance with your request in Paragraph C, page 4, of your Consent Agreement and Final Order dated March 14, 1991.

Thank you for your assistance in resolving this matter.

Very truly yours,

Issa H. Shamiyek

Director, Risk Management

IHS/smb **Enclosures** 

Mr. William E. Muno, Associate Director cc: Office of RCRA - (5HR-13)

> Solid Waste and Emergency Response Branch Secretary, Office of Regional Counsel (5CS-TUB-3)

R. E. Swan - Detrex Corporation

MD UVU691V06

REGION

FEC. D UNDER CD NO.

DATED AMOUNT.

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V

IN THE MATTER OF:	)
	DOCKET NO. V-W-90-R-28
GOLD SHIELD SOLVENTS DIVISION OF DETREX CORPORATION	) CONSENT AGREEMENT AND
12886 EATON AVENUE	) FINAL ORDER
DETROIT, MICHIGAN	)
EPA ID. NO.: MID 091 605 972	)

## **PREAMBLE**

On September 28, 1990, a Complaint was filed in this matter pursuant to Section 3008(a)(1) of the Resource Conservation and Recovery Act (RCRA) as amended, 42 U.S.C. Section 6928, and the United States Environmental Protection Agency's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22. The Complainant is the Associate Director, Office of RCRA, Waste Management Division, Region V, United States Environmental Protection Agency (U.S. EPA). The Respondent is Gold Shield Solvents, Division of Detrex Corporation, Detroit, Michigan.

### **STIPULATIONS**

The parties, desiring to settle this action, enter into the following stipulations:

- 1. Respondent has been served with a copy of the Complaint, Findings of Violation and Compliance Order (Docket No. V-W-90-R-28) in this matter.
- 2. Respondent is a Michigan Corporation whose resident agent in Michigan is Fred J. Chmielnicki, with a registered office located at 4000 Town Center

Road, Southfield, Michigan. Respondent owns and operates a facility located at 12886 Eaton Avenue, Detroit, Michigan (the "facility").

- 3. Respondent admits the jurisdictional allegations contained in the Complaint.
- 4. Respondent neither admits nor denies the specific factual allegations contained in the Complaint other than admissions contained in the Answer.
- 5. Respondent explicitly waives its right to a hearing on the allegations contained in the Complaint.
- 6. Should the Respondent fail to comply with any provision contained in the subsequent Final Order, Respondent waives any rights it may possess in law or equity to challenge the jurisdiction of U.S. EPA to bring a civil action in the appropriate United States district court to compel compliance with the Final Order and/or seek an additional penalty for the noncompliance.
- 7. Respondent consents to the issuance of the Order hereinafter set forth and hereby consents to the payment of a civil penalty in the amount therein specified.
- 8. On October 30, 1986, the State of Michigan was granted final authorization by the Administrator of U.S. EPA, pursuant to Sections 3006(b) of RCRA, 42 U.S.C. §6926(b), to administer a hazardous waste program in lieu of the Federal program, except for certain requirements or prohibitions imposed under the Hazardous and Solid Waste Amendments of 1984 not yet authorized as provided under Section 3006(g) of RCRA, 42 U.S.C. §6926(g). See 51 Federal Register 36804 (1986). See also 40 CFR 272.1150 and 272.1151. As a result.

generators, transporters and treatment, storage, or disposal facilities are regulated under the Michigan provisions found at Michigan Administrative Code Parts 1 through 8, and 10 (1985 Annual Mich. Adm. Code Supp.), rather than the Federal regulations set forth at 40 CFR Part 260 et seq. Section 3008(a)(2) of RCRA, 42 U.S.C. §6928(a)(2), provides that, after notification to the State in which a violation has occurred, U.S. EPA may enforce State regulations in those States authorized to administer a hazardous waste program.

- 9. Respondent, on October 10, 1990, submitted a complete Annual Report of exported hazardous wastes for calendar year 1989. This document was accompanied by manifest copies for six shipments reported as exported during 1989.
- 10. This Consent Agreement and Final Order shall become effective on the date it is signed by the Director, Waste Management Division, Region V.

# FINAL ORDER

Based upon the foregoing stipulations, the parties agree to the entry of the following Final Order:

- A. Respondent shall maintain compliance with the hazardous waste export requirements of MAC r. 299.9309.
- B. Respondent, shall maintain compliance with the provisions of MAC r. 299.9309(1) and r. 299.11003(i) (adopting by reference the requirements of 40 CFR 262.56), which require the submission of an Annual Report by March 1 of each year, describing the hazardous waste exported from the United States during the previous calendar year.

- C. Respondent shall pay a civil penalty in the amount of NINE THOUSAND FIVE HUNDRED DOLLARS (\$9500.00) within thirty (30) days of the effective date of this Final Order. Payment shall be made by certified or cashier's check payable to the Treasurer of the United States and mailed to U.S. EPA Region V, P.O. Box 70753, Chicago, Illinois 60673. The facility name and docket number shall be provided with said payment. Copies of the transmittal of the payment should be sent to both the Regional Hearing Clerk, Planning and Management Division (5MF-14), and to the Solid Waste and Emergency Response Branch Secretary, Office of Regional Counsel (5CS-TUB-3), U.S. EPA, 230 South Dearborn Street, Chicago, Illinois 60604.
- D. The U.S. EPA may collect interest on any amounts overdue under the terms of this Final Order at the rate established by the Secretary of the Treasury pursuant to 31 U.S.C. Section 3717. A late payment charge of \$20.00 will be imposed after thirty (30) days, with an additional charge of \$10.00 for each subsequent 30-day period over which an unpaid balance remains.

In addition, a six per cent per annum penalty will be applied on any principal amount not paid within ninety days of the date that this Final Order is signed by the Regional Administrator.

This Final Order constitutes a settlement and final disposition of the Complaint filed in this case and stipulations hereinbefore recited.

Notwithstanding any other provisions of this Order, an enforcement action may be brought pursuant to Section 7003 of RCRA, 42 U.S.C. Section 6973, or other

statutory provisions should U.S. EPA find that the handling, storage, treatment, transportation or disposal of solid waste or hazardous waste at the facility may present an imminent and substantial endangerment to human health or the environment. U.S. EPA also expressly reserves the right to take any action necessary under Section 3008 of RCRA to enforce compliance with the applicable provisions of Michigan Administrative Code 1985 AACS R299.9101 through R299.11104, inclusive; 40 CFR Parts 124 and 270; and this Order.

# **SIGNATORIES**

Each undersigned representative of a signatory to this Consent Agreement and Final Order consisting of 6 pages certifies that he or she is fully authorized to enter into the terms and conditions of this Consent Agreement and Final Order and to legally bind such signatory to this document.

Agreed this <u>18th</u>	day of .	February	, 1991.
By ISSA H. SHAMIYEH T For Gold Shield Solvents Respondent			
Title <u>Director - Risk Manag</u>	gement		
Agreed this	day of _	March	, 1991.
By Wm. E. Mu	mo		
William E. Muno, Acting A Office of RCRA, Waste Mar U.S. Environmental Protec Region V, Complainant	nagement Di	vision	
The above being agreed and o	consented to	o, it is so ordered	
thisday c	of Mari	<u>,</u> 1991.	

David A. Ullrich, Director Waste Management Division U.S. Environmental Protection Agency Region V

IN THE MATTER OF:

GOLD SHIELD SOLVENTS DETROIT, MICHIGAN DOCKET NO. V-W-90-R-28

# RCRA SENT AGREEMENT AND FINAL ORDER GN-OFF

PARII	BACKGROUND			•	
	Facility Name Gold Shield S	olvents, Dig	ision of Det	rex Corp.	· 
	Facility RCRA ID Number MID	091 605 972	,		
	Docket NumberV-W-90-R-	028			
	REB Assignee Sternard	ORC As	signee <u>Bol</u>	10	
	Summary of Agreement Facili	ty to comply	with RCRA e	export req	<u>uirement</u> s
	and pay ciwil penalty of 9,50	0.00			
PART II	CONCURRENCES ON DRAFT CAFO				
		Initials	Date	Agree	Disagree
	REB Assignee	98	17 KI		
	Chief, RCRA Enf. Section	fet	1/7/9/		
(Adm	Schief, RCRA Enf. Branch	4mB	<u> 1/5/1</u> 1		
	Asst. Regional Counsel	40	1/22		
	Chief, S.W.E.R. Section	20	1/25		
PART III	RETURN TO ORC ASSIGNEE FOR TR	ANSMITTAL OF	DRAFT TO TH	HE FACILIT	Υ .
PART IV	FINAL CAFO APPROVAL				
	REB Assignee	45	2/28/91		<del></del>
	Chief, RCRA Enf. Section	AFT FOUL	2/25/91		
	Chief, RCRA Enf. Branck	maple	3/251/91	<u> </u>	
	Asst. Regional Counsel		<u>3/4</u> 91	1	<del></del>
	Chief, S.W.E.R. Section	30	3/8/7/		
	Assoc. Dir., Office of RCRA	WEM	3/12/91	_/	
	Director, WMD		3/14/91		

PART V RETURN TO J. SHARP, 5HR-13, FOR MAILING

# CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the foregoing CAFO to be served upon the person designated below, on the date below, by causing said copy to be deposited in the U.S. Mail First Class and certified-return receipt requested, postage prepaid, at Chicago, Illinois in an envelope addressed to:

> Gold Shield Solvenics 12886 Eaton Ave. Detroit, MI 48227

I have further caused the original of the CAFO and this Certificate Service to be served in the Office of the Regional Hearing Clerk, loc in the Planning and Management Division, U.S. EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, on the date below.

These are said peron's last known address to the subscriber.

Dated this 14 day of March 1991.

Jean Sharp,

US EPA, Region V

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V

SEP 08 1990

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PROTECTION AGENCY

IN THE MATTER OF:

GOLD SHIELD SOLVENTS DIVISION OF DETREX CORPORATION 12886 EATON AVENUE DETROIT. MICHIGAN 48227

EPA ID. NO.: MID 091 605 972

DOCKET NO.

COMPLAINT, FINDINGS OF VIOLATION AND COMPLIANCE ORDER

V-W- 90 R- 28

COMPLAINT

This Complaint is filed pursuant to Section 3008(a)(1) of the Resource Conservation and Recovery Act (RCRA) as amended, 42 U.S.C. §6928(a)(1), and the United States Environmental Protection Agency's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22. The Complainant is the Associate Director, Office of RCRA, Waste Management Division, Region V, United States Environmental Protection Agency (U.S. EPA). The Respondent is Gold Shield Solvents, Division of Detrex Corporation, located at 12886 Eaton Avenue, Detroit, Michigan.

This Complaint is based on information obtained by the U.S. EPA, including manifest copies obtained by the United States Customs Service, and information contained in U.S. EPA files.

Pursuant to 42 U.S.C. §6928(a)(1), and based on the information cited above, it has been determined that Gold Shield Solvents, Division of Detrex Corporation, has violated Section 3017(g) of Subtitle C of RCRA, 42 U.S.C. §6938(g); the Michigan Hazardous Waste Management Act, Mich. Comp. Laws §299.501 et seq.; and the Michigan hazardous waste management regulations,

specifically Mich. Admin. Code ("MAC"), r. 299.9309(1) and r. 299.11003(i), which adopt the provisions of 40 CFR 262.56 by reference.

### **JURISDICTION**

Jurisdiction for this action is conferred upon U.S. EPA by Sections 2002(a)(1), 3006(b), and 3008 of RCRA, 42 U.S.C. §6912(a)(1), §6926(b), and §6928 respectively.

On October 30, 1986, the State of Michigan was granted final authorization by the Administrator of U.S. EPA, pursuant to Sections 3006(b) of RCRA, 42 U.S.C. §6926(b), to administer a hazardous waste program in lieu of the Federal program, except for certain requirements or prohibitions imposed under the Hazardous Waste and Solid Amendments of 1984 not yet authorized as provided under Section 3006(g) of RCRA, 42 U.S.C. §6926(g). See 51 Federal Register 36804 (1986). See also 40 CFR 272.1150 and 272.1151. As a result, generators, transporters, and treatment, storage, or disposal facilities are regulated under the Michigan provisions found at Michigan Administrative Code Parts 1 through 8, and 10 (1985 Annual Mich. Adm. Code Supp.), rather than the Federal regulations set forth at 40 CFR Part 260 et seq. Section 3008(a)(2) of RCRA, 42 U.S.C. §6928(a)(2), provides that, after notification to the State in which a violation has occurred, U.S. EPA may enforce State regulations in those States authorized to administer a hazardous waste program. Notice to Michigan Department of Natural Resources (MDNR) has been provided by U.S. EPA.

# FINDINGS OF VIOLATION

This determination of violation is based on the following:

- 1. Respondent, Gold Shield Solvents, Division of Detrex Corporation, is a person as defined by Section 1004(15) of RCRA, 42 U.S.C. §6903(15); MAC r. 299.9106(i); and the Michigan Hazardous Waste Management Act, Mich. Comp. Laws §299.505(2), who owns and operates a facility at 12886 Eaton Avenue, Detroit, Michigan, that generates hazardous waste.
- 2. Section 3010(a) of RCRA, 42 U.S.C. §6930(a), requires any person who generates or transports hazardous waste, or owns or operates a facility for the treatment, storage, or disposal of hazardous waste, to notify U.S. EPA of such activity within 90 days of the promulgation of regulations identifying the characteristics and listing of hazardous wastes under Section 3001 of RCRA, 42 U.S.C. §6921. Section 3010(a) of RCRA, 42 U.S.C. §6930(a), also provides that no hazardous waste subject to regulations may be transported, treated, stored, or disposed of unless the required notification has been given.
- 3. U.S. EPA first published regulations concerning the identification, generation, transportation, treatment, storage, or disposal of hazardous waste on May 19, 1980. These regulations are codified at 40 CFR Parts 260 et seq. Notification to U.S. EPA of hazardous waste activity was required in most instances no later than August 18, 1980.
- 4. The Respondent, Gold Shield Solvents, Division of Detrex Corporation, is a Michigan corporation whose registered agent is Fred J. Chmielnicki, 4000 Town Center, Suite 1100, Southfield, Michigan 48075.
- 5. On July 11, 1980, Respondent filed a notification of hazardous waste

activity for this facility with U.S. EPA pursuant to Section 3010(a) of RCRA, 42 U.S.C. §6930(a).

- 6. Section 3017(a) of RCRA provides that no person shall export any hazardous waste unless: (a) such person has provided a notification to U.S. EPA; (b) the government of the receiving country has consented to accept such waste; (c) a copy of the receiving country's written consent is attached to the manifest accompanying each waste shipment; and (d) the shipment conforms with the terms of the consent of the government of the receiving country. The State of Michigan's hazardous waste program, authorized pursuant to §§3006(b) and 3006(g) of RCRA, 42 U.S.C. §§6926(b) and 6926(g), also imposes these requirements on a person who exports hazardous waste. See MAC r. 299.9309(1) and r. 299.11003(i) (incorporating by reference the provisions of 40 CFR 262.52). Such provisions operate in lieu of the federal program.
- 7. Section 3017(g) of RCRA, 42 U.S.C. §6938(g), provides that any person who exports any hazardous waste shall file with the Administrator of U.S. EPA no later than March 1 of each year, a report summarizing the types, quantities, frequency, and ultimate destination of all such hazardous waste exported during the previous calendar year. The State of Michigan's hazardous waste program, authorized pursuant to §§3006(b) and 3006(g) of RCRA, 42 U.S.C. §§6926(b) and 6926(g), also imposes the requirement that any person who exports hazardous waste shall file with the Administrator of U.S. EPA no later than March 1 of each year, a report summarizing the types, quantities, frequency and ultimate destination of all such hazardous waste exported during the previous calendar year (the "Annual Report"). See MAC

- r. 299.9309(1) and r. 299.1103(i) (incorporating by reference the provision of 40 CFR 262.56). Such provisions operate in lieu of the federal program.
- 8. Respondent is a "primary exporter" as defined at MAC r. 299.9106(m) and 40 CFR 262.51 (adopted by reference at MAC r. 299.9309(1) and r. 299.11003(i)). "Primary exporter" means any person who is required to originate the manifest for a shipment of hazardous waste in accordance with 40 CFR Part 262, Subpart B, or equivalent State provision, which specifies a treatment, storage or disposal facility in a receiving country as the facility to which the hazardous waste will be sent and any intermediary arranging for the export.
- 9. Respondent, as primary exporter, filed a notification of intent to export hazardous waste with U.S. EPA dated April 28, 1989. The notification, EPA Notice No. 468/89, was approved by the receiving country, Canada and an Acknowledgment of Consent (AOC) was issued by U.S. EPA on September 5, 1989. This AOC allows the shipment of the specified hazardous wastes to Tricil (Sarnia) Limited, Corunna, Ontario, Canada until August 24, 1990. The AOC sent to Respondent on September 5, 1989, specifically notified Respondent that it was required to file an Annual Report with the U.S. EPA Office of International Activities Report, by March 1 of each year.
- 10. On October 18, October 30 and November 24, 1989, Respondent exported hazardous waste (MI manifests 1652368, 1652389 and 1652377 respectively) to Tricil (Sarnia) Ltd.
- 11. To date, U.S. EPA has not received from Respondent an Annual Report of its export activities during calendar year 1989. Respondent is, therefore, in violation of Section 3017(g) of RCRA and MAC r. 299.9309(1) and

r. 299.11003(i) (adopting by reference 40 CFR 262.56), which requires the submission of said Annual Report.

## COMPLIANCE ORDER

Respondent having been initially determined to be in violation of the above cited rules and regulations, and due notice having been given to the Michigan Department of Natural Resources, the following Compliance Order pursuant to Section 3008 of RCRA, 42 U.S.C. §6928, is entered:

- A. Respondent shall achieve and maintain compliance with the export requirements of Section 3017 of RCRA and MAC r. 299.9309.
- B. Respondent shall, within 15 days of the effective date of this Order, submit to U.S. EPA an Annual Report, for calendar year 1989, which complies with the requirements of MAC r. 299.9309(1) and r. 299.11003(i) (adopting by reference the requirements of 40 CFR 262.56). Said report shall be submitted to the Office of International Activities (A-106), Environmental Protection Agency, 401 M Street S.W., Washington, D.C. 20460. A copy of this report shall also be sent to the RCRA Enforcement Branch (5HR-12), U.S. EPA, Region V, Waste Management Division, 230 South Dearborn Street, Chicago, Illinois 60604-1505, Attention: Glenn Sternard.
- C. Respondent shall, within 15 days of the effective date of this Order, submit photocopies of all hazardous waste manifests which accompanied hazardous waste exported from the United States in 1989 and which were not listed in Finding Number 10, above. If no additional shipments were made, Respondent shall so state in writing. The copies or statement shall be

submitted to the RCRA Enforcement Branch, U.S. EPA, Region V at the address cited in Item B above.

A copy of these documents and all correspondence with U.S. EPA regarding this Order shall also be submitted to Dennis Drake, Chief, Compliance and Enforcement Section, Hazardous Waste Division, Michigan Department of Natural Resources, P.O. Box 30028, Lansing, Michigan 48909.

Notwithstanding any other provision of this Order, an enforcement action may be brought pursuant to Section 7003 of RCRA, 42 U.S.C. §6973, or other statutory authority where the handling, storage, treatment, transportation, or disposal of solid or hazardous waste at this facility may present an imminent and substantial endangerment to human health or the environment.

## PROPOSED CIVIL PENALTY

In view of the above determinations and in consideration of the seriousness of the violations cited herein, the potential harm to human health and the environment, the continuing nature of the violations, and the ability of the Respondent to pay penalties, the Complainant proposes to assess a civil penalty in the amount of NINE THOUSAND FIVE HUNDRED DOLLARS (\$9,500.00) against the Respondent, pursuant to Section 3008(g) of RCRA, 42 U.S.C. \$6928(g). Attachment 1 to the Complaint provides a detailed summary of the proposed civil penalty. Payment shall be made by certified or cashier's check payable to the Treasurer of the United States and shall be mailed to U.S. EPA, Region V, P.O. Box 70753, Chicago, Illinois 60673. Copies of the transmittal of the payment should be sent to both the Regional Hearing Clerk, Planning and Management Division (5MF-14), and the Solid Waste and Emergency

Response Branch Secretary, Office of Regional Counsel (5CS-TUB-3), U.S. EPA, 230 South Dearborn Street, Chicago, Illinois 60604.

Failure to comply with any requirements of this Order shall subject the above-named Respondent to liability for a civil penalty of up to TWENTY-FIVE THOUSAND DOLLARS (\$25,000) for each day of continued noncompliance with the deadlines contained in this Order. U.S. EPA is authorized to assess such penalties pursuant to RCRA Section 3008(c), 42 U.S.C. §6928(c).

# NOTICE OF OPPORTUNITY FOR HEARING

The above-named Respondent has the right to request a hearing to contest any material factual allegation set forth in this Complaint and Compliance Order or the appropriateness of any proposed compliance schedule or penalty.

Unless said Respondent has filed an answer not later than thirty (30) days from the date this Complaint is served, Respondent may be found in default of the above Complaint and Compliance Order.

To avoid a finding of default by the Regional Administrator, Respondent must file a written answer to this Complaint with the Regional Hearing Clerk (5MF-14), Planning and Management Division, U.S. EPA Region V, 230 South Dearborn Street, Chicago, Illinois 60604, within thirty (30) days of receipt of this notice. A copy of Respondent's answer and any subsequent documents filed in this action should be sent to Nicholas Bollo, Assistant Regional Counsel, (5CS-TUB-3), U.S. EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604. Failure to answer within thirty days of receipt of this Complaint may result in a finding by the Regional Administrator that the entire amount of the penalty sought in this Complaint is due and payable and

subject to the interest and penalty provisions contained in the Federal Claims Collection Act of 1966, 31 U.S.C. §3701 et seq.

Respondent's answer should clearly and directly admit, deny, or explain each of the factual allegations of which Respondent has knowledge. Said answer should contain (1) a definite statement of the facts which constitute the grounds of defense, and (2) a concise statement of the facts which Respondent intends to place at issue in the hearing. The denial of any material fact, or the raising of any affirmative defense, shall be construed as a request for a hearing. The Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22, are applicable to this administrative action. A copy of these Rules is enclosed with this Complaint.

#### SETTLEMENT CONFERENCE

Whether or not Respondent requests a hearing, Respondent may confer informally with U.S. EPA concerning: (1) whether the alleged violations in fact occurred as set forth above; (2) the appropriateness of the compliance schedule; and (3) the appropriateness of any proposed penalty in relation to the size of Respondent's business, the gravity of the violations, and the effect of the proposed penalty on Respondent's ability to continue in business. Respondent may request an informal settlement conference at any time by contacting this office. Any such request, however, will not affect either the thirty-day time limit for responding to this Complaint or the thirty-day time limit for requesting a formal hearing on the violations alleged herein.

U.S. EPA encourages all parties to pursue the possibilities of settlement through informal conferences. A request for an informal conference should be made in writing to Glenn Sternard, RCRA Enforcement Branch (5HR-12), at the address cited above, or by calling him at (312) 886-4582.

Dated	this	28 44	day	of	estenler	, 1990.
	·····				/	,

William É. Muno

Acting Associate Director, Office of RCRA

Waste Management Division

Complainant

U.S. Environmental Protection Agency

Region V

## CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the foregoing Complaint to be served upon the persons designated below, on the date below, by causing said copies to be deposited in the U.S. Mail, First Class and certified-return receipt requested, postage prepaid, at Chicago, Illinois, in an envelope addressed to:

Fred J. Chmielnicki and Registered Agent for Gold Shield Solvents Division of Detrex Corporation 4000 Town Line, Suite 1100 Southfield, Michigan 48075

Ronald E. Swan, Jr. Gold Shield Solvents, Division of Detrex Corporation 12886 Eaton Avenue Detroit, Michigan 48227

These are said persons' last addresses known to the subscriber.

I have further caused the original of the Complaint and this Certificate of Service to be served in the Office of the Regional Hearing Clerk located in the Planning and Management Division, U.S. EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, on the date below.

		i at		0+	
Dated	this	<u> </u>	_day of	<u> </u>	 1990.

Secretary, Office of RCRA

U.S. EPA, Region V

# ATTACHMENT 1 PENALTY SUMMARY

Regulation Applicable at Time of Violation MI Adm. Code (MAC)	Corresponding Federal Regulation 40 CFR	Nature of Requirement Date of Violation	Penalty Assessed
RCRA Section 3017(g) and Mich. Admin. Code r. 299.9309(1) and r. 299.11003(i)	RCRA Section 3017(g) and 40 CFR 262.56	Submission of Export Annual Report (03/01/90)	\$9,500
		Total	\$9,500

RCRA ENFORCEMENT ACTION SIGN-OFF

~PART I. BACKGROUND

	FACILITY NAME	Gold Shield Solvents, Division of Detrex Corporation
	FACILITY LOCATION	12886 Eaton Avenue, Detroit, MI
	RCRA ID NUMBER	MID 091 605 972
	ASSIGNEES	REB Sternard ORC
	NATURE OF VIOLATION	Failure to Submit Export Annual Report
	DATE OF DISCOVERY	July 6, 1990
	DATE OF REFERRAL	July 6, 1990 (NEIC) ( ) NOT APPLICABLE
	ANY OTHER OUTSTANDIN	G OR PAST ENFORCEMENT ACTIONS AGAINST THIS FACILITY:
,		
PART II	. RECOMMENDATION <u>Is</u>	sue 3008(a) action w/penalty
	-	
PART II	I: CONCURRENCES ON DR	•
		INITIALS DATE AGREE DISAGREE
	PREPARER CHIEF, RCRA ENF. S	
	CHIEF, RCRA ENF. B ASSISTANT REGIONAL	
	Nick Bol	10 311 9136/90 (V) ()
PART IV	• NAME & DATE OF 300	8(a)(2) NOTICE LETTER To Alm Howard MONK
	9/21/90	
PART V.	APPROVAL	
	<ol> <li>PREPARER</li> <li>CHIEF, RCRA ENF</li> </ol>	SECTION SECTION SECTION ()
	3. CHIEF, RCRA ENF 4. ASSISTANT REGIO	. BRANCH (Acting) 3mb 9/28/190 (V) ( )
	E Fixey	Lton 9/8/2 ( ) ( )
	,	R. SECTION ZI 7/21/50 ()
	6. ASSOC. DIR., OF	TILE UT KCKA WOM 9/18/10 (V) ( )

NOTE: Attach sign-off sheets to yellow copy of the enforcement action.

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# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

#### **REGION 5**

# 230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

SEP 2 5 1990

5HR-12

Alan Howard, Director Waste Management Division Michigan Department of Natural Resources P.O. Box 30028 Lansing, Michigan 48909

Re: Complaint and Compliance Orders

Dear Mr. Howard:

The Unjted States Environmental Protection Agency (U.S. EPA) has received information regarding several facilities' violation of regulations promulgated under the authority of the Resource Conservation and Recovery Act (RCRA), as amended. Pursuant to Section 3008(a)(2) of RCRA, I am providing notice to you that the U.S. EPA is preparing Orders under Section 3008(a)(1) for issuance to:

Ashland Chemical-Division of Ashland Oil MID 980 683 726

General Motors Corporation-Pontiac Central Plant MID 005 356 902

Gold Shield Solvents-Division of Detrex Corporation MID 091 605 972

Production Plated Plastics MID 047 153 077

These facilities have violated regulations pertaining to the export of hazardous waste from the United States.

If you should have any questions regarding these Orders, please contact Glenn Sternard of my staff. His telephone number is (312) 886-4582.

Sincerely yours,

William E. Muno'

Acting Associate Director, Office of RCRA

Waste Management Division

# PENALTY COMPUTATION WORK SHEET

Company Name: Gold Shield Solvents

Regu	lation Violated: <u>Mich. Admin. Code r. 299.9</u> <u>Section 3017(g)</u>	9309(1)+R299.11003(i): RCRA
	essments for each violation should be deter totalled.	rmined on separate work sheets
<u>Part</u> 1.	<u>I - Seriousness of Violation Penalty</u> Potential for harm:	Moderate
2.	Extent of deviation:	Major
3.	Matrix cell range:	<del></del>
	Penalty amount chosen: Justification for penalty amount chosen:	\$9500.00
4.	Per-day assessment:	_ 0 -
Part	t II - Penalty Adjustments	
1.	Good faith effort to comply/lack of good faith:	ge <u>Dollar Amount</u>
2.	Degree of willfulness and/or negligence:	
3.	History of noncompliance:	
4.	Other unique factors:	
5.	Justification for adjustments:	
6.	Adjusted per-day penalty (Line 4, Part II):	\$9500.00
7.	Number of days of violation:	
8.	Multi-day penalty (Line 7, Part II X Line 6, Part II):	
9.	Economic benefit of noncompliance: Justification:	<u></u>
10.	Total (Lines 8 + 9, Part II):	
11.	Ability to pay adjustment: Justification:	<del>-</del> · · · · · · · · · · · · · · · · · · ·
12.	Total penalty amount (< \$25,000/day of violation):	\$9500.00

### RCRA PENALTY COMPUTATION - JUSTIFICATION

REGULATION(S) VIOLATED: 40 CFR

POTENTIAL FOR HARM CATEGORY: The facility's failure to submit has a significant negative impact on the statutory and regulatory purposes of the RCRA Program. It is clear that Congress wanted effective monitoring of Hazardous waste exports when they included an annual report requirement, specifically in the statute. (RCRA Section 3017(g)) Therefore the failure to submit such a report has a significant negative impact on the RCRA program, thus a moderate potential for harm is assessed.

# EXTENT OF DEVIATION CATEGORY:

Facility has failed, to date, to submit an Annual Report which satisfies the requirement of this regulation, thus being considered a major deviation from the requirement.

PENALTY ASSESSED THIS VIOLATION:

# U.S. EPA REGION V RCRA ENFORCEMENT SETTLEMENT CONFERENCE

# MEETING ROSTER

SUBJECT	GOLD	ShiELD	Socients	 **************************************
DATE	10/30/90			
	Region 3		7	

PERSON	REPRESENTING	ADDRESS	TELEPHONE
glenn Sternard	US EPA, REB	230 S. Dearborn St.	(312) 886-4582
155A SHAMIYEH	DETREX	4000 Town Center Southfill	(313) 358-5800
RONSWAN	DETREX	4000 Town Center SouthSill 12886 ENTON, DETROIT MIEZZ	(313) 491-4550
Nick Bollo	US EPA ORC	IN West JACKSON Chgo	(312) 886-6828
			`
	<del></del>		
	<del></del>		

# SETTLEMENT CONFERENCE

NAME Glenn Sternard
SUBJECT 6020 ShiseD Sourcets
SUBJECT 6020 ShiseD Souvents
SUMMARY OF CONFERENCE
_

FY 1989 HAZARDOUS WASTE MID 091 605 972 EPA ID: Good Shield Solvent, Div of Dereex Tion TS TREET Date of initial evaluation which EPA -S = State C = Contractor/EPA 5a. Agency responsible is the basis for this report: . for evaluation: O = Other B = Contractor/State 17/06/19 X = Oversight 6. Type of Evaluation Covered in this Report: Facility Inspected As: S/T CII (Compliance Eval Inspection) Part B Call-in Inspection LDF Trans GEN SQG NR 2 = Sampling Inspection Part A Withdrawal Inspection 3= Record Review 9= Closed Facility/Units Inspection CMI: (Comprehensive GWM Isral.) 10= Other General Inspection 5 = Compliance Schedule Evaluation 11 = Case Development Inspection Facility Filed As: S/T LDF 6= Critica Complaint 12= O&M Inspection 13 = CA Oversight Inspection Trans GEN 7. Date of evaluation covered by this report (if different from #5 above) 7a. Eval Comment: VIOLATIONS AND RELEASES X = Violations, no specialties B = Violations and specialty S = Same violation or specialty Z = Pending determination O = No violation or specialty found

# SPECIALTIES:

I = No insurance only

C = CA Schedule Violation

H = High Priority Violation

= Class I only

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Ba. Viol. Comment:

# 9. ENFORCEMENT ACTIONS:

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# Codes for Types of Enforcement Actions:

01 = Interim Status Compliance Letter

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02 = 3007 Information Request

03 - Warning Letter

2772

01 = Administrative Complaint

W = Ina! Administrative Order

06 = 3013 Admin Order (initial) (State equiv.

07 - 3013 Admin Order (final) Auste equiv.

08 = 7003 Admin Order/State equiv.

10 = Informal Action

COMPL SCHED

11 = Isled Civil Action

12 - Filed Criminal Action

13 = NOV to State (Viol refe for St action)

14 = NOV to 131A (Viol refe for 12A action) 15 - CA Initial Administrative Order

16 - CA Final Administrative Order

17- CIRCLA 100 Admin Order (IIIA)

RESPACIENCY: L= USIEPA

18 - Civil Referral to St AG/USDOJ

19 - Final Judicial Order

20 - CLRCIA 106 fund lineacce activity

21 - Notice of Non-compliance

22 - Fed. Facility Compliance Agreement

23 - Fed Facility Referra! to USITA 110

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STATE OF MICHIGAN

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON MARLENE J. FLUHARTY GORDON E. GUYER KERRY KAMMER O STEWART MYERS DAVID D. OLSON RAYMOND POUPORE



JAMES J. BLANCHARD, Governor

OFFICE OF RCRA Waste Management Division U.S. EPA, REGION V

# DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING P.O. BOX 30028 LANSING, MI 48909

DAVID F. HALES, Director

May 1, 1989

Mr. I. H. Shamiyeh Detrex Corporation P.O. Box 5111 Southfield, Michigan 48086-5111

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Dear Mr. Walton:

SUBJECT: Consent Order

Detrex Corporation

Enclosed please find a fully executed original of the Consent Order between the Detrex Corporation and this Department. The Order became effective on April 24, 1989, the date of the Director's signature. Please note that the penalty stipulated in paragraph 12 of the Order is due by May 24, 1989.

Sincerely,

Dennis M. Drake, Chief

Compliance & Enforcement Section

Waste Management Division

Enclosure

cc: Mr. Douglas A. Donnell, Mike, Myers, Beckett & Jones (w/enclosure)
 Ms. Laura Lodisio, U.S. EPA (w/enclosure)

Ms. Marilyn Sabadzka, U.S. EPA (w/enclosure)

Mr. Steve Chester, AAG (w/enclosure)

Ms. Kathleen Clancy, DNR (w/enclosure)

Ms. JoAnn Merrick, DNR (w/enclosure)

# STATE OF MICHIGAN DEPARTMENT OF NATURAL RESOURCES WASTE MANAGEMENT DIVISION

In the matter of administrative proceedings against Detrex Corporation a corporation organized under the laws of the State of Michigan and doing business at 12886 Eaton Avenue, City of Detroit County of Wayne, State of Michigan 48227

WMD Order No. 64-01-1989

EPA I.D. No. MID 091 605 972

#### CONSENT ORDER

This proceeding results from failure of Detrex Corporation to submit a complete operating license application as specified in a Notice of Deficiency (NOD) issued on December 29, 1988 by the Staff of the Department of Natural Resources ("DNR"). The DNR alleges that Detrex Corporation ("Detrex"), a Michigan corporation, doing business at 12886 Eaton Avenue, City of Detroit, County of Wayne, Michigan, is in violation of the Michigan Hazardous Waste Management Act, 1979 P.A. 64, as amended ("Act 64"), MCL 299.501, et seq; MSA 13.30(1) et. seq., and rules promulgated thereunder. Detrex and the DNR agree to resolve the alleged violations in this matter and to terminate this proceeding by entry of this Consent Order.

# I. STIPULATIONS

Detrex and the DNR stipulate as follows:

l. Pursuant to its authority under Act 64, the DNR has promulgated administrative rules pertinent to the identification, generation, treatment storage, disposal, and transportation of hazardous wastes in Michigan. These

rules are set forth in the Michigan Administrative Code, R 299.9101 - R 299.11107.

- 2. On October 30, 1986, the State of Michigan was granted final authorization by the Administrator of the U.S. Environmental Protection Agency ("U.S. EPA"), pursuant to Section 3006(b), the Resource Conservation and Recovery Act ("RCRA") 42 U.S.C. §6926(b), to administer a hazardous waste program in Michigan in lieu of the federal program, 40 CFR Part 271, 51

  Federal Register 36804 (October 16, 1986). Section 3008 of RCRA, 42 U.S.C. §6928, provides that the U.S. EPA may enforce state regulations in those states authorized to administer a hazardous waste program.
- 3. Detrex is a person as defined by Section 5(2) of Act 64 and R299.9106(g). Detrex owns and operates a facility at 12886 Eaton Avenue, Detroit, Michigan, that stores hazardous waste (the "storage facility").
- 4. On November 18, 1980, Detrex filed a notification of hazardous waste activity for the Detroit facility with U.S. EPA pursuant to Section 3010 of RCRA. Detrex's EPA I.D. No. is MID 091 605 972.
- 5. The Director of the DNR is authorized by Section 48(1) of Act 64, to issue orders to comply. Accordingly, the Director has authority to issue and enter into this Order to comply by consent with Detrex.
- 6. Detrex stipulates to the issuance and entry of this Order to comply by consent and stipulates that the termination of this matter by a final order to be entered as a Consent Order is proper and acceptable. This Consent Order, thus, shall be considered a final order of the DNR and shall become effective on the date it is signed by its Director.
- 7. Detrex and the DNR agree that the signing of this Consent Order is for settlement purposes only and does not constitute an admission by Detrex that the law has been violated.

# II. COMPLIANCE PROGRAM

- 8. Detrex shall achieve and maintain compliance with all of the applicable requirements of Act 64 and its rules, and shall achieve compliance with the requirements specified below in accordance with the following schedule:
  - A. By May 8, 1989, Detrex shall submit a hydrogeological report that meets the requirements of R 299.9506.
  - B. By May 8, 1989, Detrex shall submit an environmental monitoring plan. The plan shall include both soil and groundwater monitoring programs. A waiver demonstration may be submitted in lieu of a soil monitoring program if the requirements of R 299.9611(4) are met.

# III. REPORTING

9. Detrex shall submit all items required in Section II to the Chief of the Waste Management Division, Department of Natural Resources, P.O. Box 30241, Lansing, Michigan 48909. In addition, Detrex shall notify the Chief of the Waste Management Division in writing of the date of completion of all the requirements of this Order within 30 days of such completion.

## IV. RETENTION OF RECORDS

10. Upon request by an authorized representative of the DNR, Detrex shall make available to the DNR all records, plans, logs and other documents required to be maintained under this Order or pursuant to Act 64, or its rules. All such documents shall be retained at the Detroit facility for at

least a period of three (3) years from the date of generation of the record unless a longer period of record retention is required by Act 64, or its rules.

## V. RIGHT OF ENTRY

ll. Detrex shall allow any authorized representative or contractor of DNR, upon presentation of proper credentials, to enter upon the premises of the Detroit facility at all reasonable times for the purpose of monitoring compliance with the provisions of this Order. This paragraph in no way limits the authority of DNR to conduct tests and inspections pursuant to Act 64, and its rules, or any other applicable statutory provision.

# VI. FINES and PENALTIES

- 12. Within 30 days of entry of this Order, Detrex shall pay to the General Fund of the State of Michigan, by check made payable to the State of Michigan and delivered to the Assistant Attorney General in Charge, Environmental Protection Division, Law Building, 525 W. Ottawa, Lansing, Michigan 48913, a civil fine in the sum of \$2,000. This sum is in addition to any fees, taxes, or other fines that may be imposed on Detrex by law.
- 13. Detrex shall pay a stipulated penalty of \$250 per violation for each day Detrex fails to comply with the provisions of subparagraphs A and B of paragraph 8 of this Order. Stipulated penalties shall be paid within thirty (30) days after written demand made by the DNR by check made payable to the State of Michigan and delivered to the Assistant Attorney General in Charge, Environmental Protection Division.

14. Detrex agrees not to contest the legality of the civil fine paid pursuant to paragraph 12 above. Detrex further agrees not to contest the legality of any stipulated penalties assessed pursuant to paragraph 13 above, but reserves the right to dispute the factual basis upon which a demand by DNR for stipulated penalties is made in a court of competent jurisdiction.

# VII. GENERAL PROVISIONS

- 15. DNR reserves the right to pursue any other remedies to which it is entitled for any failure on the part of Detrex to comply with the requirements of Act 64, and its rules.
- 16. Notwithstanding any other provision of this Consent Order, an enforcement action may be brought by DNR pursuant to Act 64 or other statutory authority where the generation, storage, transportation, treatment, or disposal of hazardous waste at the Detroit facility may present an imminent and substantial hazard to the health of persons or to the natural resources or is endangering or causing damage to the public health or the environment.
- 17. The DNR and Detrex consent to enforcement of this Order in the same manner and by the same procedures for all final orders entered pursuant to Act 64, MCL 299.501; MSA 13.30(1), and enforcement pursuant to 1970 P.A. 127, MCL 691.1201 et seq.; MSA 14.528(201) et seq.
- 18. This Order in no way affects Detrex's responsibility to comply with any other applicable state, federal, or local laws or regulations.
- 19. The provisions of this Order shall apply to and be binding upon the parties to this action, their officers, directors, agents, servants, employees, successors and assigns, and all persons, firms and corporations having notice of the Order. Detrex shall give notice of this Order to any

prospective successor in interest prior to transfer of ownership and shall notify the DNR of such proposed sale or transfer.

# VIII. TERMINATION

- 20. This Order shall remain in full force and effect until expressly terminated by a written Notice of Termination issued by the Chief of the Waste Management Division. Detrex may request that the Chief issue a written Notice of Termination at any time after achieving compliance with this Order. Such a request shall consist of a written certification that Detrex has fully complied with all of the requirements of this Order and payment of any fines and penalties required in this Order. Specifically, this certification shall include:
  - (i) the date of compliance with each provision of the compliance program in Section II and the date any fines or penalties were paid;
  - (ii) a statement that all required information has been reported to the Chief of the Waste Management Division;
  - (iii) confirmation that all records required to be maintained pursuant to this Order are being maintained at the facility; and
  - (iv) any other information requested by the Chief of the Waste Management Division.

# **Signatories**

The undersigned CERTIFY they are fully authorized by the party they represent to enter into this Order to comply by consent and to EXECUTE and LEGALLY BIND that party to it.

Detrex	Corporation
--------	-------------

By:

Shami yeh

Title: Risk Management Director

Date: April 11

Department of Natural Resources

1989

Title: Director

Date:

1989

Frank J. Kelley Attorney General

Stewart H. Freeman

Assistant Attorney General

In Charge

**Environmental Protection Division** 

720 Law Building

Lansing, Michigan 48913

# DETREX CORPORATION Solvents Division



Seven West Square Lake Road Bloomfield Hills, MI 48302

TELEPHONE: (313) 335-4696

November 6, 1990

RECEIVED

Mr. Glenn Sternard U.S. EPA, Region V 230 S. Dearborn Street Chicago, IL OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Dear Mr. Sternard:

As promised in our meeting yesterday, I am forwarding a copy of the new policy and procedures which will ensure compliance with RCRA Import/Export Reporting requirements. As you will see upon review of the Quality Control Coordinator's position description, the specific responsibility for reporting is under taken by the Q.C. Coordinator. We also have implemented a plan for maintaining files which contain duplicate copies of manifests for each Import/Export shipment. By doing so, a summary of the years shipments can easily by created. From this summary, the Annual Report would be generated and forwarded by the end of the first calendar week in January, annually. We are very confident that these procedures will ensure that the facility remains in compliance.

We will contact you in the near future regarding the unfortunate previous violation once we have reviewed the fine procedures.

Once again, I would like to thank you and Mr. Bollo for your time yesterday.

Sincerely,

DETREX CORPORATION

Ronald E. Swan, Jr.

Branch Manager

RS: jg

# DETREX CORPORATION Solvents Division



12886 Eaton Ave. DETROIT, MI 48227

FAX:(313) 491-8044

TELEPHONE: (313) 491-4550

October 17, 1990

Ms. Beverly Shorty, Regional Hearing Clerk (5MF-14) Planning & Management Division U.S.E.P.A. Region V 230 South Dearborn Street Chicago, Ill. 60604



OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V.

Dear Ms. Shorty,

As required by the provisions outlined in the Complaint, Findings of Violation and Compliance Order for Gold Shield Solvents Division of Detrex Corporation, this correspondence serves as a response to the aforementioned document. At this time Detrex Corporation does not wish to request a formal hearing but rather to request an informal Settlement Conference.

Detrex Corporation has reviewed the Findings of Violation and concludes that the facts are substantiated and that, through an unfortunate oversight, neglected to submitt the required Annual Report. Although negligence is in most cases, inexcusable, I would like to bring to your attention the following facts which may make the proceedings of the Informal Settlement Conference more expeditious:

- \* The requirement of Annual Reporting was delineated in the notice 468/89 but was the last, and presumeably least important, requirement indicated.
- \* Detrex Corporation is exporting this waste stream to Tricil for incineration, which is the best disposal technology, and therefore eliminating potential for environmental impairment.
- \* Appropriate manifest documents for each shipment are included and disseminated to MI DNR and Ontario Ministry of Environment. In the past U.S.E.P.A., MI. DNR, OME have been known to issue "friendly reminders" of reporting due dates. This has not been the case in this matter.

Page 2
Regional Hearing Clerk (5MF-14)

\* The proposed fine for the violations indicated exceeds to original cost to incinerate the waste. This tends to indicate the proposed fine to be excessive.

I look forward to your response and an opportunity to address these issues at the Informal Settlement Conference

Sincerely,

Rohald E. Swan, Jr. Branch Manager

cc: Mr.Nicholas Bollo (5CS-TUB-3) U.S.E.P.A.

RCRA Enforcement Branch (5HR-12)U.S.E.P.A

Mr. Glenn Sternard - U.S.E.P.A.

Dr. Benedict Okwumabua - Mi. DNR

Mr. I. H. Shamiyeh - Detrex

Mr. M. J. Tepatti - Detrex

RS/bh

SEP 28 1990

246.527.584

5HR-13

# CERTIFIED MAIL RETURN RECEIPT REQUESTED

Fred J. Chmielnicki Registered Agent for Gold Shield Solvents 4000 Town Center Road Suite 1100 Southfield, Michigan 48075

Re: Complaint, Findings of Violation

and Compliance Order Gold Shield Solvents

Division of Detrex Corporation EPA I.D. No.: MID 091 605 972

Dear Mr. Chmielnicki:

Enclosed please find a Complaint and Compliance Order which specifies this Agency's determination of certain violations by Gold Shield Solvents, Division of Detrex Corporation, of the Resource Conservation and Recovery Act (RCRA) as amended, 42 U.S.C. §6901 et seq. This Agency's determination is based on information obtained by the Agency and from information contained in our files. The Findings in the Complaint state the reasons for such a determination. In essence, the facility failed to meet particular requirements of RCRA relating to the export of hazardous waste to a foreign facility. Accompanying the Complaint is a Notice of Opportunity for Hearing.

Should you desire to contest the Complaint, a written request for a hearing is required to be filed with Ms. Beverely Shorty, Regional Hearing Clerk (5MF-14), United States Environmental Protection Agency, 230 South Dearborn Street, Chicago, Illinois 60604, within 30 days from receipt of this Complaint. A copy of your request should also be sent to Nick Bollo, Office of Regional Counsel (5CS-TUB-3) at the above address.

Regardless' of whether you choose to request a hearing within the 30-day time limit following service of this Complaint, you are extended an opportunity to request an informal settlement conference.

If you have any questions or desire to request an informal settlement conference, please contact Glenn Sternard, RCRA Enforcement Branch, United States Environmental Protection Agency, (5HR-12), 230 South Dearborn Street, Chicago, Illinois 60604-1505. His phone number is (312) 886-4582.

Sincerely yours,

William E. Muno Acting Associate Director, Office of RCRA Waste Management Division

Enclosure

cc: Dennis Drake, MDNR

Ronald E. Swan, Gold Shield Solvents

bcc: Robert Small, OWPE, OS-520

Nick Bollo, 5CS-TUB-3 Jean Sharp, 5HR-13 ∨

Regional Hearing Clerk, 5MF-14V

MI Permit Section, 5HR-13

ORC	ASST. REGIONAL COUNSEL	S.W.E.R. SECTION CHIEF	S.W.E.R. BB. CHIEF	FEETOSSA FEETOSSA
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7. Date of Delivery PS Form 3811, Apr. 1989	3 and 4. Pur your address from being returned date of deligated check box!  3. Article Add R.E. GOLD 12886 Detro  5. Signature 6. Signature	SENDER:
ivery () () . Apr. 1989	P 999 244 244  RECEIPT FOR CERTIFIED MAIL  NO INSURANCE COVERAGE PROVIDED  NOT FOR INTERNATIONAL MAIL  (See Reverse)	US EPA
*U.S.G.P.O. 1985-238-815	Sent to R.E. SWAN, JR GOLD SHIELD SOLVENTS  Street 12866 Eaton  P.O. State and ZIP Code Detroit, MI 48227  Postage Is 2	5HR-12
-81	Certified Fee Special Delivery Fee Restricted Delivery Fee	STERNARD
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STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON MARLENE J. FLUHARTY KERRY KAMMER O. STEWART MYERS DAVID D. OLSON RAYMOND POUPORE

JAMES J. BLANCHARD, Governor

# DEPARTMENT OF NATURAL RESOURCES

DAVID F. HALES, Director

S.E. MICHIGAN FIELD OFFICE Waste Management Division 505 W. Main Northville, MI 48167

February 22, 1989

LB-in compliance

Mr. Ronald Swan, Jr.
Operations Manager
Detrex Corp. Gold Shield Solvents Division
12886 Eaton Avenue
Detroit, MI 48227

RE: MID 091605972 V

Dear Mr. Swan,

On February 8, 1989, an inspection was conducted at your facility located at 12886 Eaton Avenue, Detroit, MI. The purpose of the inspection was to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended; Michigan's Hazardous Waste Management Act, Act 64 of 1979, as amended; Michigan's Liquid Industrial Waste Hauling Act, Act 136, P.A. 1969, as amended; and Land Disposal Restriction requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended.

As a result of that inspection, it has been determined that your facility is in violation of the following requirement(s):

 The facility has not obtained a written assessment, reviewed and certified by an independent, qualified, registered professional engineer, that attests to the tank systems integrity by January 12, 1989. 40 CFR 265.191.

This assessment is needed for existing tank system that does not have secondary containment meeting the requirements of 40 CFR 265.193. Your hazardous waste accumulation tanks does not meet RCRA secondary containment requirements.

Not cited as a violation, please be aware that the upgrading for existing tanks greater then 15 years of age should be provided by January 12, 1990.

Page 2, 2-22-89
Detrex Corporation
Detroit, MI
RE: MID 091605972

2. Hazardous waste accumulation tanks do not have appropriate controls to prevent overflow from tanks. 40 CFR 265.194(b)(2). The tank system should have an overflow prevention control such as level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby tank.

The following comments are offered:

- 1. As discussed during the inspection, your Transfer Facility Permit, Special Condition 7, requires the facility to maintain a separate operating log for the transfer facility operation, including a separate inspection log. The operating log should not include shipments in bulk quantities or other wastes not associated with the transfer facility.
- 2. Financial Review. Financial Assurance requirements under Act 64 has been amended as of February 1989. The new amendments requires all treatment, storage and disposal facility that have not yet been issued an operating license under the Act to meet Financial Assurance requirements under Act 64, Part 7, within 180 days of the effective date of the amendatory rule. Although you meet the Financial Test, under RCRA, it appears that you will not satisfy the Financial Test under Act 64. the facility should review alternative financial coverage for closure.

We request your response by March 23, 1989 documenting your corrective actions to these violations.

If you have any questions, please contact me at (313) 344-4670.

Jay Mithell

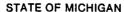
Faye Mitchell

Environmental Quality Analyst

FM:bs Enclosure

cc: B. Okwumabua

U.S. EPA, Region V





ATURAL RESOURCES COMMISSION
THOMAS J. ANDERSON
MARLENE J. FLUHARTY
STEPHEN V. MONSMA
O. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE
HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

# DEPARTMENT OF NATURAL RESOURCES Gordon E. Guyer, Director

S.E. MICHIGAN FIELD OFFICE Waste Management Division 505 W. Main Northville, MI 48167

March 18, 1988

Gold Shield Solvents
Division Detrex Chemical
12886 Eaton Avenue
Detroit, MI 48227
ATTN: Mr. Ronald Swan Jr.
Operations Manager

RE: MID 091605972

Dear Mr. Swan Jr.,

On March 1, 1988, an inspection was conducted at your facility located at 12886 Eaton Ave., Detroit, MI. The purpose of the inspection was to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended; Michigan's Hazardous Waste Management Act, Act 64 of 1979, as amended; Michigan's Liquid Industrial Waste Hauling Act, Act 136, P.A. of 1969, as amended; and Land Disposal Restriction requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended.

I have determined that your facility has no deficiencies of the requirements in the areas reviewed during that inspection.

Thank you for your cooperation during my visit.

Sincerely

Faye Dade

Environmental Quality Analyst

Enclosure

cc: B. Okwumabua



STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION THOMAS J. ANDERSON MARLENE J. FLUHARTY GORDON E. GUYER KERRY KAMMER O. STEWART MYERS DAVID D. OLSON RAYMOND POUPORE

JAMES J. BLANCHARD, Governor

#### **DEPARTMENT OF NATURAL RESOURCES**

RONALD O. SKOOG, Director

Gordon E. Guyer, Director State Office Building 350 Ottawa, N.W. Grand Rapids, MI 49503 Phone: 616-456-5071

June 1, 1987

Ms. Sharon Burns
Detrex Chemical Industries
Gold Shield Solvent Division
'312 Ellsworth
'Grand Rapids, MI 49503

RE: MID020906764

Dear Ms. Burns:

On May 27, 1987, staff of the Department of Natural Resources conducted an investigation of your facility located at 312\*Ellsworth, Grand Rapids, Michigan to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended, and with Michigan Act 64, P.A. of 1979. A copy of the completed inspection form is enclosed.

As a result of the investigation, staff of the Department of Natural Resources determined that the above facility is in violation of the requirements of Subtitle C of RCRA and Act 64. Specifically, staff found that the following requirement(s) were not being met:

- 1) The company is not keeping a complete operation record as required by 40 CFR, Part 265 and Rule 609 of Act 64. A good record exists for incoming wastes in drums but an equally good record does not exist for the still bottom waste stored in tanks. Since the company's Part A document lists tank storage as a regulated process, an operating recording record containing applicable information must be prepared for the tank storage operation.
- 2) It is estimated that approximately 15 containers of hazardous waste are not labeled with the words "Hazardous Waste" or the hazardous waste number as required by Rule 306 of Act 64. These consist of older wastes which have been stored on-site for more than one year.

Ms. Sharon Burns June 1, 1987 Page 2

- The single drum of waste still bottoms being accumulated next to the recovery unit was not labeled with the words "Hazardous Waste" or the waste number as required by Rule 306 of Act 64.
- 4) The basement concrete vault used for secondary containment for the waste heel tanks is not coated with an impermeable coating as required by 40 CFR, Part 265, Subpart J.

An inspection was also conducted to determine compliance with the recently enacted hazardous waste land ban disposal requirements for F001-F005 waste solvents. The following violations of these new regulations were observed:

- 1) As a generator, the company is not providing the receiving facility with the treatment standards(s) (mg/l) as part of it's land ban certification required under 40CFR, art 268.7(a)(1).
- As a storage facility for land ban wastes, the company has failed to clearly identify and date all containers of waste entering storage prior to reclaim. Also, some of these older, undated containers have been stored for more than one year. Both of these situations constitute violations of 40 CFR, Part 268.50 of RCRA.
- The company's operating record is not keeping accurate records of dates and quantities of land ban wastes entering and leaving storage, especially tank storage located in the basement. This is a violation of 40CFR, Part 268.50 of RCRA.

We request that you respond to this letter by June 15, 1987, providing documentation to this office regarding those actions being taken to correct the above stated violations and correction of same violations prior to July 10, 1987. The DNR will evaluate your response and determine our facility's compliance status.

If you have any questions, feel free to contact me and address your response to the address on this letter.

Sincerely,

Dale M. DeKraker

Dale Dakuber

Environmental Quality Analyst Hazardous Waste Division

DMD/dkw Enclosure





THOMAS J. ANDERSON MARLENE J. FLUHARTY STEPHEN V. MONSMA O. STEWART MYERS DAVID D. OLSON RAYMOND POUPORE HARRY H. WHITELEY

ATURAL RESOURCES COMMISSION

JAMES J. BLANCHARD, Governor

#### **DEPARTMENT OF NATURAL RESOURCES**

Gordon E. Guyer, Director S.E. Michigan Field Office 505 W. Main Northville, MI 48167

December 5, 1986

Mr. Michael Tepatti Gold Shield Solvents Division Detrex Chemical 12886 Easton Avenue Detroit, Mi 48227

RE: MID 091605972

Dear Mr. Tepatti:

On December 3, 1986, acting as a representative of the United States Environmental Protection Agency, I performed an inspection of your facility located at 12886 Eaton Ave., Detroit, MI to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

I have determined that your facility has no deficiencies of the requirements of RCRA in the areas reviewed during that inspection.

Thank you for the cooperation during my visit.

Sincerely,

Faye Dade

Hazardous Waste Division

FD:bs

cc: U.S. EPA, Region V

B. Okwumabua

# Request 1

Please provide the date, State of incorporation, Registered Agent and his address for Detrex Chemical Industries, Inc. (hereinafter referred to as DCI).

# Response 1

Incorporation date: May 27, 1925

State: Michigan

Registered Agent: Ferd J. Chmielnicki

Registered Address: 4000 Town Center - Suite 1100

Southfield, MI 48075

#### Request 2

Provide the addresses of all facilities owned or operated by DCI in the Fields Brook water basin in Ashtabula, Ohio. If any of the facilities that have been operated by DCI were not at all times of operation owned by DCI, provide the name(s) of the other owner(s) of the facility and a description of each property's location.

#### Response 2

# (A) State Road Facility - (State Road Plant)

Address of this facility is:

State Road, Ashtabula, Ohio 44004

The chemical plant on State Road, Ashtabula, Ohio was originally built and operated by a company formed in 1946, a company partly owned by Hooker Electrochemical Company (Hooker, now a subsidiary of Occidental Petroleum) and Detrex Corporation. The name of the company was Hooker-Detrex Incorporated. Hooker-Detrex, Inc. started operation in 1950. In June 1956 Hooker sold its interest to Detrex.

Until 1956, Hooker handled all aspects of on-site operations, other than marketing. Thus, Hooker was responsible for, among other things, the complete design of the plant, engineering and construction of the plant, staffing the plant, all plant processes and chemical manufacture including effluent and waste disposal and the daily maintenance and operation of the plant. DCI responsibility was solely for marketing the plant products until June 27, 1956.

# (B) Middle Road Facility - (Chlor-Alkali Plant and Fine Chemical Plant)

Address of this facility is:

Middle Road, Ashtabula, Ohio 44004

DCI leased this property from Union Carbide from 1962 until 1974. DCI constructed the Chlor-Alkali plant on the leased property in 1962. DCI then purchased the property from Union Carbide in 1974 and sold the whole facility to Sobin Chemicals, Inc. on May 31, 1974. Sobin Chemicals, Inc. was acquired by International Minerals and Chemicals; then this property was purchased by Linden Chlorine Products, who are the present owners.

# DETREX CHEMICAL INDUSTRIES, INC.



P.O. BOX 501, DETROIT, MICHIGAN 48232

TWX 810-224-4756

TELEPHONE (313) 358-5800

July 21, 1986

#### VIA FEDERAL EXPRESS

Mr. Basil G. Constantelos United States Environmental Protection Agency Region 5 230 South Dearborn St. Chicago, IL 60604

Re: Fields Brook - Ashtabula County, Ohio

Dear Mr. Constantelos:

Attached is our response to your Request for Information letter of May 16, 1986 which was received by us on May 21, 1986.

We are identifying a limited portion of our response as confidential. We would appreciate your maintaining confidentiality.

I certify that all information contained in our answers to the Request for Information is true and accutate to the best of my knowledge and belief.

I further certify that all documents being submitted as part of the attached response to the Request for Information is true and authentic to the best of my knowledge and belief.

Very truly yours,

I. H. Shamiyeh

Manager - Corporate Engineering

& Risk Management

IHS/smb Attach.

Subscribed and sworn to before me

this 21st day of July, 1986.

Burry J. Burns'

Beverly J. Hurns

Notary Public, Oakland County, MI My Commission expires March 1, 1989

# (C) Middle Road Facility - (Fine Chemical Plant only)

This plant was built by DCI and operated by DCI from about 1969 until it was sold to Sobin Chemicals, Inc. in May, 1974 along with the Chlor-Alkali Plant. This Fine Chemical Plant was leased back from Sobin in 1974 by DCI for a period of five (5) years. The plant was operated by Sobin personnel under the supervision of DCI personnel. Sobin was responsible for this plant's effluent and waste disposal to the regulatory agencies although these functions were planned, supervised and paid for by DCI. The five (5) year lease was cancelled and operations ceased in 1978.

## Request 3

If any of the property owned by DCI in the Fields Brook water basin since has been sold, leased or interests in said property otherwise conveyed by DCI to a third person or by a third person to DCI, state that third person's name and the dates of any conveyance or sale.

#### Response 3

# (A) State Road Facility (State Road Plant)

DCI did not sell, lease or convey its interests in said property in any other way.

(B) Middle Road Facility (Chlor-Alkali Plant and Fine Chemical Plant)

See Response 2 (B) and 2 (C) above.

## Request 4

Provide a legal description of any DCI facility or property located in the Fields Brook water basin in Ashtabula, Ohio.

#### Response 4

# (A) State Road Property

(1) The following is a legal description of 25.3797 acres as taken from "The Land Title Guarantee and Trust Company" Policy No. LK 5322:

Situated in the Township of Ashtabula, County of Ashtabula, and State of Ohio: and being part of the Holmes Tract in said Township and being further bounded and described as follows: Beginning at a point in the center line of State Road, so called, where the same is intersected by the Southerly line of land conveyed to William A. Otto by deed recorded in Volume 323 Page 515 Ashtabula County Records, and which point is distant 1730.67 feet Northerly from the intersection of the center line of State Road with the center line of Middle Road as measured along said center line of State Road; Thence North 89° 48'50" East along the Northerly line of land of said William A. Otto a distance of 200 feet (passing through an iron pin at 30.00 feet) to an iron pin at the Southeasterly corner of land of said William A. Otto, which iron pin is also in the northerly line of land conveyed to William B. Edwards and Mary A. Edwards by deed recorded in Volume 410, page 81 of Ashtabula County Records; thence North 89° 48'50" East along the northerly line of land of said Edwards a distance of 1406.73 feet to a concrete monument in the north east corner of land of said Edwards: which point is also the southwesterly corner of land conveyed to the New York Central Railroad Company by deed recorded in Volume 309 Page 107, Ashtabula County Records; Thence North 0° 44'35" East along the Westerly line of land so conveyed to the New York Central Railroad Company a

distance of 477.74 feet to a concrete monument, which point is the southwesterly corner of lands conveyed to the New York Central Railroad Company by deed recorded in Volume 305 Page 303 of Ashtabula County Records; Thence North 0° 28' 45" East along the westerly line of land so conveyed to said The New York Central Railroad Company a distance of 207.86 feet to a concrete monument at the southeasterly corner of lands conveyed to W. H. Crawford, et al, by deed recorded in Volume 316, Page 136 of Ashtabula County Records; Thence South 89° 49' 10" West along the southerly line of lands conveyed to said Crawford, et al, and along the southerly line of lands conveyed to Sam and Pasqualine Di Salvatore by deed recorded in Volume 361, Page 398 of Ashtabula County Records (passing through a concrete monument at 840.33 feet) a distance of 1618.40 feet to the center line of State Road; Thence South 0°29'15" East along the center line of State Road a distance of 410.13 feet to an iron pipe in the center line of said State Road; Thence South 0°03'05" East along the center line of said State Road a distance of 275.56 feet to the place of beginning and containing 25.3797 acres of land according to a plat of survey made by Bauer Surveys Company, Cleveland, Ohio, dated January 6, 1949 and July 18, 1949, be the same more or less, but subject to all legal highways.

(2) The following is a legal description of 31.792 acres as taken from "The Land Title Guarantee and Trust Company" Policy No. LK 4023:

Situated in the Township of Ashtabula, County of Ashtabula, and State of Ohio. Known as being part of the Holmes Tract in said Township and bounded and described as follows: Beginning at the center line intersection of Middle Road and State Road; Thence N.0°39' W. along the center of State Road 607.47 feet to an iron pin monument at an angle in said State Road; Thence N. 0° 03' W. along the center of said State Road 298.6 feet to the principal beginning point of the herein described premises; Thence N. 0°03' W. along the center of State Road 825 feet to the Southwest corner of lands of A. J. & G. M. Severino; Thence N. 89° 49'E. along the southerly line of said lands of said Severino and the southerly line of lands of Chas. P. Otto et al (passing thru an iron pin in the Easterly line of State Rd.) 1606.7 feet to a concrete monument. in the Westerly line of lands of the New York Central R.R.; Thence S. 0°27' W. along the Westerly line of said lands of said New York Central R.R. 902.98 feet to a concrete monument; Thence N. 87° 23'30" W. along the Northerly line of said New York Central R.R. lands and the Northerly line of lands of George E. Magee 1600.53 feet (passing thru an iron pin in the Easterly line of State Road) to the center of State Road and the place of beginning and containing within said bounds 31.792 acres of land. Be the same more or less, but subject to all legal highways.

### (B) Middle Road Property

The following is a legal description of 25.36 acres as taken from a limited warranty deed.

Commencing at a point in the center of Middle Road at the southeast corner of an 11.09 acre parcel of land conveyed to Union Carbide and Carbon Corporation by George F. Erler and Ellen Gay Erler by deed dated September 24, 1954 and recorded in Vol. 511 at Page 196 of Ashtabula County record of deeds, said starting point being also 1671.66' northeasterly along the centerline of Middle Road from an iron pin at the intersection of the east line of the Erie Tract and said centerline as surveyed by W. O. Wier in 1954; Thence southwesterly along said centerline 591.37' to a point on Union Carbide and Carbon Corporation's system of plant coordinates known as 3774.00' east; Thence north 1044.70' along coordinate 3774.00' east to coordinate 3580.00' south; Thence west 340.00' to coordinate 3434.00' east; Thence north 150.00' to coordinate 3430.00' south; Thence west 24.00' to coordinate 3410.00' east; Thence north 753.00' to coordinate 2677.00' south; Thence east 807.22' along coordinate 2677.00' south to a point in the east line of the 11.09 acre parcel of land conveyed to Union Carbide and Carbon Corporation by said Erlers, said point being southeasterly about 325.74' along said east line, from the northeast corner of said parcel; Thence southeasterly along the east line of said parcel 1560.38' to the center of Middle Road and the place of beginning, containing 25.36 acres of land more or less, but subject to all legal highways.

# Request 5

Provide copies of any and all documents pertaining to the use and ownership of any Detrex Chemical Industries, Inc. facility or property in the Fields Brook water basin in Ashtabula County, Ohio, including, but not limited to, deeds, contracts, leases, subleases, purchase agreements and related correspondence.

#### Response 5

#### (A) State Road Facility

(See Appendix 1 for attached copies of documents).

#### (B) Middle Road Facility

(See Appendix 2 for attached copies of documents).

#### Request 6

Provide a list of all present and former plant managers, production managers and plant engineers at any of the above-described facilities. Please state the date of their employment with DCI, position held and last known address. Also, please indicate the numbered Requests regarding which they may have information.

# Response 6

# (A) State Road Facility (State Road Plant)

Plant Manager		Date of Employment	Last Known Address
Howard McKinley	(Hooker) (DCI)	8-8-45 thru 6-27-56 6-27-56 thru 1-31-64	Deceased
Robert Grill		4-1-63 thru 10-72	7391 Abby Court Mentor, Ohio 44060
Robert Jones		2-5-51 thru present	2683 Walnut Blvd. Ashtabula, Ohio 44004
Robert Malloy		2-5-69 thru 5-30-74	Chicago area, IL
Charles Guy		7-25-66 thru present	711 Bunker Hill Ashtabula, Ohio 44004
Production Managers		Date of Employment	Last Known Address
John Pettit	(Hooker)	(Unknown)	Deceased
Martin Kuhn	(Hooker) (DCI)	7-10-51 thru 6-27-56 6-27-56 thru 8-7-64	Taft area, LA
James Weet		12-1-64 thru 5-24-68	Unknown
Donald Kinnee		3-1-65 thru 2-25-72	Toledo area, OH
David Knowles		3-2-70 thru 10-31-72	Wyandotte area, MI
Arnold Freede		3-4-53 thru present	5105 Kain Ave. Ashtabula, Ohio 44004
Plant Engineers		Date of Employment	Last Known Address
John Nuber	(Hooker) (DCI)	12-18-50 thru 6-27-56 6-27-56 thru 4-30-63	Unknown
Charles Perry	•	12-4-61 thru 6-26-68	Toledo area, OH
Donald Kinnee		3-1-65 thru 2-25-72	Toledo area, OH
Gary Demeny		9-20-65 thru 10-11-67	Unknown

# (B) Middle Road Facility (Chlor-Alkali Plant)

Plant Managers	Date of Employment	Last Known Address
Robert Baker	9-1-62 thru 5-31-72	Niagara Falls area, Canada
Robert Malloy	2-5-69 thru 5-30-74	Chicago area, IL
Production Managers	Date of Employment	Last Known Address
Robert Jones	2-5-51 thru present	2683 Walnut Blvd. Ashtabula, Ohio 44004
Roy Wagner	10-14-63 thru 6-8-69	St. Louis area, MO
John Kehm	2-23-70 thru 10-25-73	Taft area, LA
David Knowles	3-2-70 thru 10-31-72	Wyandotte area, MI
Charles Guy	7-25-66 thru present	711 Bunker Hill Ashtabula, Ohio 44004
Plant Engineers	Date of Employment	Last Known Address
Robert Kriz	2-1-52 thru 5-7-76	Berwyn area, IL
Charles Guy	7-25-66 thru present	711 Bunker Hill Ashtabula, Ohio 44004
John Kehm	2-23-70 thru 10-25-72	Taft area, LA
(C) Middle Road Facility (Fin	e Chemical Plant)	•
Plant Managers	Date of Employment	Last Known Address

Plant Managers	Date of Employment	Last Known Address
Raymond Berg	2-3-69 thru 7-8-71	Deceased
Charles Guy	7-25-66 thru present	711 Bunker Hill Ashtabula, OH 44004
Dennis Ahlstrom	11-11-63 thru 5-30-74	North Kingsville area, OH
Production Managers	Date of Employment	Last Known Address
Robert Musolff	10-16-68 thru 2-16-79	2931 West 13th Ashtabula, OH 44004

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Arnold Freede, Charles Guy and Robert Jones are current Detrex employees and have general knowledge or information of most of the numbered Requests herein. All of the other persons listed are no longer with DCI. Accordingly, DCI cannot indicate those numbered Requests for which they may have information.

#### Request 7

Provide the names of any predecessor or successor corporations or partnerships which owned or operated any DCI facility, as described above, in Ashtabula County, Ohio.

### Response 7

(A) State Road Facility (State Road Plant)

See Response 2 (A)

(B) Middle Road Facility (Chloro-Alkali and Fine Chemical Plant)

See Response 2 (B)

(C) Middle Road Facility (Fine Chemical Plant only)

See Responses 2 (B) and 2 (C)

#### Request 8

On what date did DCI commence operations of its facility at or near State Road, Ashtabula County, Ohio?

# Response 8

In 1950 Hooker-Detrex started operation. In 1956 Hooker sold its interest in the plant to Detrex. (Refer to Response 2 (A) above for more details).

#### Request 9

Provide information you may have regarding contamination from your plant(s) entering Fields Brook, or a tributary thereto, either directly or indirectly.

### Response 9

#### (A) State Road Facility (State Road Plant)

Detrex is aware of various reports (listed below) some of which were prepared under the supervision of USEPA which identify certain substances in the soil about and under Fields Brook. (1) Field Investigation of Hazardous Waste Sites Task Report to the Environmental Protection Agency

Contract No. 68-01-6056 October, 1981

"Mitre Model Scoring of Fields Brooks, Ohio" by Gary P. Clemons, Ph.D. of Ecology and Environment, Inc.

(2) Dredging of Polluted Sediments from the Ashtabula River and Confined Disposal at Ashtabula

"Ashtabula Harbor - Ohio Draft Environmental Impact Statement" (December, 1983. Revised May, 1984)

(3) Final Remedial Investigation Report

Fields Brook Site Ashtabula, Ohio WA 19.5L46.0 W65246.CO March 28, 1985

- (4) "Identification of Hazardous Organic Chemicals in fish from the Ashtabula River, Ohio and Wabash River, Indiana"
  - U.S. Environmental Protection Agency Environmental Research Laboratory - Duluth
- (5) "Mass Spectral Determination of Octachlorostyrene in Fields Brook" March 15, 1982 By Douglas W. Kuchl, Research Chemist
- (6) Effects of Fields Brook on the Biota of the Ashtabula River By Dr. Andres M. White Dr. Norman A. Alldridge

Environmental Resource Assoc., Inc. 20700 North Park Blvd. University Heights, Ohio 44118

(7) "Ashtabula Sediment Sampling and Analysis Program" By Thomas Rooney David Ringwald Michael O'Rell

TRW - Environmental Division Contract No. 68-02-3174

(8) A report on the Acute Toxicity of Stream Water from Fields Brook at State Road

To <u>Pimephales Promelas</u> and <u>Pulex</u>
Report No. 81-197-NEDO
Biomonitoring Section
Ohio Environmental Protection Agency, July, 1981.

(9) A report on the Toxicity of Fields Brook Water to Daphia Pulex Report No. 80-173-NEDO
Biomonitoring Section
Ohio Environmental Protection Agency

- (10) "Subsurface Investigation"

  Detrex Chemical Industries, Inc.
  Ashtabula, Ohio
  November, 1981
  - By Burgess & Niple, Limited (Copies of this report were given to the Ohio EPA as well as Region V. Another copy of the report is enclosed in Appendix 3

Please also refer to: DCI's NPDES permit discharge monitoring reports which were submitted to OEPA and/or Region V and DCI's similar reports, some of which were submitted to OEPA and/or Region V. For details, refer to Attachments in Appendix 4

- (B) DCI has no information regarding Middle Road Facility (Chlor-Alkali Plant).
- (C) DCI has no information regarding Middle Road Facility (Fine Chemical Plant).

### Request 10

Provide any knowledge or information you may have regarding any property owned by you in Ashtabula County, Ohio, which may have been contaminated by prior owners or users. Your response should include, but not necessarily be limited to:

- (a) Names of prior owners or users.
- (b) Use of facility and property by prior owners or users.
- (c) Disposal practices of prior owners or users.
- (d) Volume and nature of sources of such contamination.

# sponse 10

# (A) State Road Facility (State Road Plant)

(a) The prior owners of the property are:

Four parcels of land totaling 25.3797 acres were sold and/or granted for \$1.00 to Hooker-Detrex in the period August 24, 1949 to December 22, 1950. The original owners of these parcels are: Parcel 1 (DCI), Parcel 2 (Joseph G. and Dorothy A. Amzibel), Parcel 3 (Union Carbide and Carbon Corporation) and Parcel 4 (Anthony J. and Grace M. Severino).

One other parcel having an area of 31.792 acres was sold by William B. and Mary A. Edwards to DCI on March 15, 1949.

The purpose of the above land purchases was for Hooker-Detrex to build a plant to produce trichloroethylene and perchloroethylene.

- (b) See response 2 (A).
- (c) The following are disposal practices followed by Hooker-Detrex (1950-1956):

Chlorinator vent gases contained: chlorine, acetylene, hydrogen chloride and entrained chlorinated solvent vapor. These vent gases, off a header, were scrubbed in packed towers containing re-circulated lime slurry. The resulting mixture containing excess lime slurry was pumped to settling ponds. Insoluble materials were settled and periodically dredged and hauled to landfill. Excess water containing dissolved solids, decanted from the ponds and were discharged, originally, through 001 ditch to Fields Brook and later through 002 to the

DET-17

State Road underground conduit to Fields Brook. At times, caustic soda (sodium hydroxide) solution was substituted for the lime slurry for this scrubbing operation.

- IU -

The intermediate products, tetrachloroethane (tetra) and pentachloroethane (penta), were formed by reaction of chlorine and acetylene in the presence of a ferric chloride catalyst. The crude tetra and penta formed was washed with water to remove the ferric chloride. This water wash, containing ferric chloride and small amounts of dissolved organics was decanted through a water separator and then was discharged through 002 to Fields Brook.

Until 1954, and intermittently in 1955, the intermediate products, tetra and penta, were reacted with hot lime slurry to form trichloroethylene and perchloroethylene and calcium chloride solution. The organic materials were steam stripped off and recovered by condensation and decantation. The remaining slurry of lime, calcium chloride and small amounts of dissolved organics was discharged to the settling ponds discussed above.

Periodically, still bottoms from the solvent purification distillation units were recycled through the lime treatment process as described above.

Periodically, after 1954, hydrogen chloride from the cracking process (dehydrochlorination of tetra and penta over activated carbon catalyst) was neutralized in the lime scrubber described above. This neutralization occurred during infrequent interruptions in the pipe-line sale of hydrogen chloride gas to General Tire. The resulting calcium chloride solution was discharged to the settling ponds discussed above.

- (d) See (c) above for nature of sources of disposed materials. Volumes disposed of are unknown as records were not retained.
- (B) Middle Road Facility (Chlor-Alkali and Fine Chemical Plants)

We have no knowledge of any property contamination by prior owners.

- (a) Union Carbide
- (b) Unknown to DCI
- (c) Unknown to DCI
- (d) Unknown to DCI

#### Request 11

Provide any information you may have regarding sources of contamination of Fields Brook.

# Response 11

(A) State Road Facility (State Road Plant)

See Response 9 (A).

(B) Middle Road Facility (Chlor-Alkali and Fine Chemical Plant)

See Responses 9 (B) and 9 (C) above.

# Request 12

Provide the following information regarding any french drains or sewer lines (including storm, sanitary or combined sewers) which receive or have received runoff com the property located near State Road in Ashtabula County, Ohio:

- (a) The location of each sewer line.
- (b) Whether each sewer line is connected to the main trunk line.
- (c) Does any sewer line have direct or indirect access to Fields Brook or a tributary thereof?

# Response 12

- (a) Enclosed under Appendix 5 is a Burgess & Niple, Ltd. drawing taken from the Burgess & Niple report showing the sewer lines.
- (b) No, the only line connected to a trunkline running North-South is 002. See Response 12 (c) below.
- (c) The line described as 002 does connect to a North-South line leading to Fields Brook, jointly used by RMI Chlorine-Sodium plant, Diamond Shamrock and DCI. This trunkline discharges to Fields Brook.

#### Request 13

Provide the following information regarding drainage ditches which receive or have received runoff or discharges from the property located near State Road in Ashtabula County, Ohio:

- (a) The location of each drainage ditch.
- (b) Whether runoff or discharge from each drainage ditch has direct or indirect access to Fields Brook or a tributary thereto.
- (c) Any information regarding the presence, or potential for releases, of hazardous substances or constituents in the ditches.

#### Response 13

- (a) Enclosed under Appendix 5 is a Burgess & Niple, Ltd. drawing taken from the Burgess & Niple report showing these ditches.
- (b) Yes.
- (c) Detrex has no information regarding the presence or potential for releases of hazardous substances or constituents in the ditches other than those contained in the various reports listed in our response to question 9 (A).

#### Request 14

Does your company have, or did your company ever have, an NPDES permit for discharges to Fields Brook or a tributary thereto?

#### Response 14

Yes.

# uest 15

Describe each manufacturing process that DCI has operated at its Ashtabula County, Ohio, facilities including the facility on State Road. For each process provide the

years that the operations occurred and all the raw materials associated with or relating to the process.

# Response 15

# (A) State Road Facility (State Road Plant)

(1): Process: Chlorinated solvents (trichloroethylene, perchloroethylene) production, storage and shipment

#### Years:

Hooker-Detrex

1950 - 1954 Lime Process

Hooker-Detrex

1954 - 1956 Cracker Process

DCI

1956 - 1972 Cracker Process

Raw Materials: Chlorine and acetylene

(2) Process: Hydrochloric acid by absorption of by-product hydrogen chloride

Years: Estimated Period (1954 - 1964)

Anhydrous gas was conveyed to General Tire and Rubber Company for manufacturing vinyl chloride. No records are available.

Estimated Period (1964 - 1972)

DCI discontinued conveying the anhydrous gas to General Tire and Rubber Company and started absorbing it in water to produce hydrochloric acid.

Raw Materials: By-product hydrogen chloride and water

(3) Process: Hydrochloric acid by burning chlorine and hydrogen together to form hydrogen chloride which is then absorbed in water

Years: Estimate 1973 to present

Raw Materials: Chlorine, hydrogen, water

(4) Process: Production, storage for internal use and sale of N-methyl pyrrole

Years: Estimate 1956 to present

Raw Materials: Furan and monomethylamine over activated alumina catalyst

(5) Process: Production, storage for sale of pyrrole

Years: 1979 to present, intermittently

Raw Materials: Furan and anhydrous ammonia over activated alumina catalyst

(6) Process: Production of catalyst for the Pacific Industrial Furnace Company, a division of DCI

Years: 1977 to 1985

Raw Materials: Firebrick, nickel acetate crystals

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## Request 16

Describe any hazardous substances that may have been contained in any by-products or wastes from each of the manufacturing processes described in Request 15. Also, describe the amounts of waste, by-products or hazardous substances generated by each of such processes on a yearly basis.

# Response 16

# (A) State Road Facility (State Road Plant)

(1) Hazardous substances in the by-products and wastes of the process described in response 15 (A) (1).

	Type of	
Hazardous Substance	Containing Medium	Amount per Year
Hexachlorobutane	Solid waste	417,000 lbs. total
High boiling chlorinated hydrocarbons (still bettoms)	Liquid Mate	No records; estimate
Calcium chloride*	Liquid waste	No records or estimates are available
Calcium hydroxide*	Liquid waste	No records or estimates are available
Chlorinated C <sub>2</sub> hydrocarbons	Liquid waste	No records or estimates are available
Ferric and ferrous chloride	Liquid waste	No records or estimates are available
Calcium hypochlorite	Liquid waste	No records or estimates are available
Sodium hydroxide	Liquid waste	No records or estimates are available
.Ammonium chloride	Liquid waste	No records or estimates are available

NOTE: All items with an asterisk represent materials which, although listed above, are not classified as hazardous substances.

<sup>(2)</sup> Hazardous substances in by-products or wastes in processes described in response 15 (A) (2) above.

Hazardous Substance	Type of Containing Medium	Amount per Year
Calcium chloride*	Waste	No records or estimates are available
Calcium hydroxide*	Waste	No records or estimates are available

(See note on items with an asterisk under 16 (A) (1) above).

(3) Hazardous substances in by-products or wastes in processes described in response 15 (A) (3) above:

Hazardous Substance	Type of Containing Medium	Amount per Year
Hydrochloric acid	Waste	No records or estimates are available
Calcium chloride*	Waste	No records or estimates are available
Calcium hydroxide*	Waste	No records or estimates are available

(See note on items with an asterisk under 16 (A) (1) above).

(4) Hazardous substances in by-product or waste in processes described in response 15 (A) (4) above:

Hazardous Substance	Type of Containing Medium	Amount per Year
Monomethylamine-water	Waste	No records or estimates are available
Furan-water	Waste	No records or estimates are available
Methyl pyrrole and pyrrole high boiling derivatives	By-product	No records or estimates are available

(5) Hazardous substances in by-product or wastes in processes described in response 15 (A) (5) above:

Hazardous Substance	Type of Containing Medium	Amount per Year			
Ammonia-water	Waste	No records or estimates are available			
Furan-water	Waste	No records or estimates are available			
Pyrrole high boiling compounds	By-product	No records or estimates are available			

- (6) No hazardous substances in by-products or wastes in processes described in response 15 (A) (6) above.
- (7) No hazardous substances in by-products or wastes in processes described in response 15 (A) (7) above.
- (8) No hazardous substances in by-products or wastes in processes described in response 15 (A) (8) above.
- (9) No hazardous substances in by-products or wastes in the processes described in response 15 (A) (9) above. (The proprietary mixtures for other Detrex Divisions).
- (10) No hazardous substances in liquid by-products or wastes in processes described in response 15 (A) (11) above.
- (11) No hazardous substances in liquid by-products or wastes in processes described in response 15 (A) (11) above.

# (B) Middle Road Facility - (Chlor-Alkali Plant)

(1) Hazardous substances in by-products or wastes in processes described in response 15 (B) (1) above.

Hazardous S	ubstances	Type of Containing Medium	Amount per Year			
Mercury		Liquid waste	Records	left	with	Sobin
Mercury		Rydrogen by-product	Records	left	with	Sobin
Sodium hypo	chlorite	Liquid waste	Records	left	with	Sobin
Mercury			Records	left	with	Sobin
Sodium hydr	oxide	Liquid waste	Records	left	with	Sobin

(2) No waste or by-product from 15 (B) (2) above (bleach process).

# (C) Middle Road Facility (Fine Chemical Plant)

- (1) Wastes from the mandelic acid process were:
  - a. 10-15% hydrochloric acid solution in water. Estimated amount 70,000 gals/yr.
  - b. Acid salt brine solution contained 3-5% mandelic acid. Estimated amount approx. 187,500 gals/yr.
- (2) Commercial Solvents Tolling Product

No waste

# (3) Sulfur Base Compounds

Wastes from these products were:

- (a) Dilute hydrochloric acid solution. Estimated amount is approximately 75,000 gals/year.
- (b) The inorganic phase referred to in response 15 (C) (3) above is approximately 200,000 gals/year.
- (4) Mercapto thiazole adduct is estimated to produce approximately 6,000 to 7,000 gals/year of 10-15% hydrochloric acid solution in water.

# (5) Phosphorus Pentoxide Adducts

No by-products or waste streams were produced from processing these products.

#### Request 17

Describe the storage, treatment and disposal practices for any by-products or wastes associated with each of the manufacturing processes described in response 15. This description should identify any use of drums, tanks, lagoons, ponds, waste piles, ditches, marshes, swamps, land treatment or disposal areas, public sewers, landfills, creeks, or waterways used or affected by such practices.

#### Response 17

# (A) State Road Facility (State Road Plant)

(1) Storage, treatment and disposal practices for hazardous substances in response 15 (A) (1).

Hexachlorobutane crystals were stored in a ground surface pile and, eventually, moved to a concrete pad, stored in fiber drums and sent to Rollins Environmental Services in Bridgeport, New Jersey for incineration (See response 26 for details).

High Boiling Chlorinated Hydrocarbons, Calcium Chloride in Water, Chlorinated C2 hydrocarbons, Ferrous and Ferric Chloride in water, Calcium and Sodium Hydroxide and Hypochlorite in water and Ammonium Chloride in water was discharged to settling ponds. Water was decanted through a ditch into Fields Brook. Solids and settled organics, including still bottoms, were dredged by Koski Construction Co. and hauled by them to their landfill on Middle Road, Ashtabula County. See answer to question 37 d. for closure of the lagoon referred to above.

(2) Storage, treatment, and disposal practices for hazardous substances in response 15 (A) (2).

Calcium Chloride and Calcium Hydroxide in water were discharged to settling ponds where water was decanted through a ditch into Fields Brook, solids were dredged by Koski Construction Co. and hauled by them to their landfill on Middle Road, Ashtabula County. See response 37 d. for closure of the ponds referred to above.

(3) Storage, treatment and disposal practices for hazardous substances from response 15 (A) (3) and 16 (A) (3).

Some hydrochloric acid waste was hauled in Detrex tank trucks to ponds owned by Koski Construction Co. on Middle Pond. Ashtabula County, and Moski was

by Koski Construction Co. on Middle Road, Ashtabula County, and Koski was paid to put the material into his landfill.

Calcium chloride and calcium hydroxide in water, resulting from neutralization of waste hydrochloric acid, was discharged to settling ponds and handled as in 17 (A) (2) above.

(4) Storage, treatment and disposal practices for hazardous substances from response 15 (A) (4) and 16 (A) (4).

Monomethylamine water solution was discharged through outfall 002 to Fields Brooks under controlled pH condition according to NPDES permit.

Furan water solution was discharged through outfall 002 to Fields Brook under controlled pH condition according to NPDES permit.

High boiling methyl pyrrole derivatives were stored in storage tanks and, eventually, shipped to Hukill Chemical Co., Bedford, Ohio, which arranged to have the materials incinerated.

- (5) Storage, treatment and disposal practices for hazardous substances from response 15 (A) (5) and 16 (A) (5). The wastes described under response 16 (A) (5) above were discharged through outfall 002 to Fields Brook under controlled pH conditions according to NPDES permit.
- (6), (7), (8), (9), (10), (11) Storage, treatment and disposal practices for hazardous substances from responses 15 (A) (6) thru 15 (A) (11) and 16 (A) (6) thru 16 (A) (11). There are no hazardous wastes produced in the processes described under responses 15 (A) (6) thru 15 (A) (11).

# (B) Middle Road Facility (Chlor-Alkali Plant)

(1) Storage, treatment and disposal practices for hazardous substances in 15 (B) (1) and 16 (B) (1).

Small amounts of mercury were contained in the wastewater discharged to Lake Erie (through an effluent ditch) until DCI was advised by EPA that such practices were deemed unsafe, after which time DCI was granted an NPDES permit. A lagoon was used for storage on a temporary basis until mercury in the effluent met EPA guidelines.

Mercury in hydrogen by-product was recovered by condensation for re-use. This reduced the mercury concentration down to a level acceptable to EPA Air Quality and then the hydrogen was discharged to atmosphere through a stack, or conveyed to Linde Air products via pipe line, or to DCI on State Road for burning with chlorine to make hydrogen chloride.

We believe that mercury in solid waste from brine settler was hauled away by a salt company prior to the institution of lagoons. It was then placed in lagoon area, which eventually was closed by one of the companies that succeeded DCI. Sodium hypochlorite in waste was discharged to Lake Erie through an effluent ditch with a controlled pH within EPA guidelines.

Sodium hydroxide in waste was discharged to Lake Erie through an effluent ditch with a controlled pH within EPA guidelines.

(2) Storage, treatment and disposal practices for hazardous substances from responses 15 (B) (2) and 16 (B) (2). No hazardous substances were generated from the processes described in response 15 (B) (2) above.

# (C) Middle Road Plant (Fine Chemical)

# (1) Mandelic Acid

Wastes generated by production of this compound were collected in a pond with no outlet and were periodically removed and hauled away by Browning and Ferris Industries, Inc. and trucked to East Palestine, Ohio for disposal.

# (2) Commercial Solvent Tolling Product

No waste was generated.

- (3) Waste generated by production of the sulfurized oils as described under responses 15 (C) (2) and 16 (C) (2) above was accumulated in a pond and hauled away by Browning & Ferris for disposal in East Palestine, Ohio.
- (4) No waste was generated.
- (5) No waste was generated.

# Request 18

Describe the nature of any records and recordkeeping practices that have ever been maintained relating to any storage, treatment or disposal practices for any byproducts or wastes associated with each manufacturing process described in response to Request 15.

# Response 18

DCI has:

- (1) Some records on the Browning & Ferris emptying of the ponds/lagoons in both the State Road and Fine Chemical plant.
- (2) The records on the disposal of the hexachlorobutane by incineration at Rollins Environmental Services in Bridgeport, New Jersey.
- (3) NPDES discharge monitoring records for State Road Plant since 1974.
- (4) Manifesting records to Hukill Chemicals and Systech Inc.

#### Request 19

Describe each chemical reclamation process that DCI has operated at its Ashtabula, Ohio facilities. For each process state the years during which operation of the process occurred, the type of process equipment used, the types of chemicals associated with each reclamation process, the volume processed annually by each process, and the sources of the chemicals.

# Response 19



No chemical reclamation processes were carried out at Ashtabula, Ohio DCI facilities.

# Request 20

Describe the nature of any records and recordkeeping practices that have ever been maintained relating to the volume and kinds of chemicals received and processed as described in response to Request 19.

#### Response 20

Not applicable.

#### Request 21

Describe the characteristics and nature of wastes or by-products associated with each reclamation process. Such description should include any characteristic or listing that such waste would likely have under 40 CFR Part 261. The description should also include any hazardous substances the waste would likely contain.

#### Response 21

Not applicable.

### Request 22

Describe the nature of any records and recordkeeping practices that have ever en maintained relating to the characteristics and nature of the wastes or by-products scribed in response to Request 21.

#### Response 22

Not applicable.

## Request 23

Describe the practices and conditions relating to the storage of hazardous wastes or hazardous substances upon their arrival at each of DCI's Ashtabula County, Ohio, facilities until the time of their reclamation. Such a description should include, along with any dates when any significant changes occurred:

- a. What types of wastes were/are stored in drums.
- b. What types of wastes were/are stored in tanks.
- c. What types of containment systems for spills or releases were provided at the storage areas.
- d. The location of any storage areas.
- e. Whether drums have been marked with the generator's or transporter's name.



f. Whether hazardous wastes from more than one source were ever mixed or commingled in a tank. How common was this practice? Did this include emptying drums into tanks?

- g. What was the practice regarding the cleanup of spilled materials from these stored hazardous wastes.
- h. Did spills or releases (including those caused by fire) of these materials ever occur while they were awaiting processing.
- i. Whether such wastes were ever stored in lagoons or ponds.
- j. What types of such wastes were stored in lagoons or ponds.
- k. What types of liners or any other impervious barriers did lagoons or ponds have to prevent the release of the materials.
- 1. What types of wastes, if any, were ever stored in waste piles.
- m. What records and recordkeeping practices have ever been maintained on storage, and what is the state of those records.

## Response 23

Not applicable.

#### Request 24

Describe DCI's practices relating to the disposal and treatment of still bottoms, sludges and other non-reclaimed materials accumulated in the reclamation process itself. Lease include in such a description, along with the dates for different practices:

- a. whether the non-reclaimed materials were drummed up for disposal.
- b. if such non-reclaimed materials were drummed up, whether they were normally (or necessarily) put back in the drums of the seller from whom they originated.
- c. whether the non-reclaimed material was allowed to accumulate and was stored prior to treatment or disposal.
- d. the locations and types of storage areas used for storage of the non-reclaimed materials. Examples of types of storage areas could include drums, tanks, pits, waste piles, ponds or lagoons.
- e. 'any containment systems utilized at these storage areas to help prevent releases of the stored material to the environment.
- f. whether any spills or releases of these stored materials ever occurred.

  Approximately when.
- g. where and how such materials were disposed.
- h. what records and recordkeeping practices have ever been maintained in regard to the above practices. What is the state of the records?

# Response 24

Not applicable.

#### Request 25

Describe practices relating to any incineration processes used for disposal of wastes from each of DCI's Ashtabula, Ohio facilities. This description should include:

- a. the years during which each incinerator operated.
- b. the rated capacity for each incinerator.
- c. the normal operating and peak temperature for each incinerator.
- d. the rated retention time for materials during the burn.
- e. the type of fuel used to bring the incinerator up to operating capacity.
- f. how the material was fed to the incinerator.
- g. what types of operating records were kept, including temperature and feed rate.
- h. the types of air pollution control devices that were installed on each incinerator and stack test results.
- i. whether any misting or raining from the incinerator stacks ever occurred.
- j. what quantities of incinerator ashes or sludges were generated from the incineration processes.
- k. what types of materials and volumes were burned in these incinerators.
- 1. were any PCBs known to have been burned in these incinerators.
- m. did the materials that were burned include non-reclaimable materials from stills.
- n. were materials from stills accumulated and stored prior to incineration.
- o. did the materials sent to DCI include materials sent there solely for purposes of incineration.
- p. were materials sent to DCI for incineration on occasion otherwise disposed. How and why?
- q. how and where were by-products of the incineration process (including ash bottoms, fly ash, sludges and scrubber water) disposed.
- r. any records and recordkeeping practices that have ever been maintained relating to the described practices. What is the state of those records?

#### esponse 25

No on-site incineration processes have been used for disposal of wastes from DCI facilities other than a brief period of experimental incineration of hydrogen sulfide gases for one sulfurizing operation under EPA permit.

# Request 26

It is U.S. EPA's understanding that DCI has disposed of materials in an area located at the southeast corner of its property adjacent to and west of the drainage ditch, and on the south side of the railroad tracks. Describe the disposal activities that have occurred at the area including:

- a. The years during which materials were placed in that area.
- b. The quantity of materials which were placed in that area.
- c. The processes from which those materials were derived.
- d. The types of containers, if any, in which the materials were disposed.
- e. Whether any of the materials would be in containers identifying the source of the materials.
- f. A listing of the types of chemicals or hazardous wastes disposed of in that area, including a description of their characteristics under 40 CFR Part 261.
- g. The names of any other parties who have disposed of wastes in this area and the types of wastes, if known. The description should also include any hazardous substances the waste would likely contain.
- h. Any understandings or arrangements that DCI had with any other parties for the disposal of solid wastes or materials in this area.
- i. Provide any information that you have regarding sample analyses that have been conducted of materials in or adjacent to this area.

# Response 26

The hexachior process process process below is the closest to fit the request's location description. It is west of the 001 ditch and south of the railroad tracks, but it is not quite in the southeast corner; although it is located in a south-easterly direction of the DCI property. It the EPA is referring to this hexachlorobutane pile, then the following statements respond to this request as follows:

- (a) 1964 until the chlorinated solvents production was shut down in 1972.
- (b) 417,000 lbs.,
- (c) Production of trichloroethylene and perchloroethylene.
- (d) (e) (f) The pile of crystals identified as hexachlorobutane was removed from the ground prior to November 19, 1980, and placed in a covered building that had a concrete floor. The crystals were then packaged in 30 gal. polyethylene-lined fiber drums, stored in DCI warehouse prior to shipment (via Rollins trucks)

and incineration at Rollins Environmental Services in Bridgeport, New Jersey. This was accomplished in the period 3/81 - 1/82. For shipping purposes, the material was manifested as K 030.

- (g) (h) No parties other than DCI disposed of any of their waste at the subject area.
- (i) A sharp melting point was obtained in the laboratory indicating that it was hexachlorobutane.

If request 26 refers to the ponds/lagoons in the southeast quadrant of the DCI property, the response would then point to the three settling ponds constructed by Hooker-Detrex and whose use was discontinued prior to 1953.

#### Request 27

It is U.S. EPA's understanding that DCI has disposed of materials in a lagoon area at the northeast corner of its property, north of the railroad tracks and east of the chemical drum storage area. Describe the disposal activities that have occurred at the lagoon area including:

- a. The years during which materials were placed in that lagoon.
- b. The quantity of materials which were placed in that lagoon.
- c. The processes from which those materials were derived.
- d. The types of containers, if any, in which the materials were disposed.
- e. Whether any of the materials would be in containers identifying the source of the materials.
- f. A listing of the types of chemicals or hazardous wastes disposed of in that lagoon area including a description of their characteristics under 40 CFR Part 261.
- g. The names of any other parties who have disposed of wastes at this lagoon and the types of wastes, if known. The description should also include any hazardous substances the wastes would likely contain.
- h. Any understandings or arrangements that DCI had with any other parties for the disposal of solid wastes or materials at this lagoon.
- i. Provide any information you have regarding sample analyses that have been conducted of materials in or adjacent to the lagoon.

#### Response 27

- a. Hooker-Detrex for the period 1950-1956; DCI for the period 1956-1972.
- b and c. See responses 15 (A) and 16 (A).

- d. and e. Containers are not used.
- f. See response 16 (A).
- g. None.
- h. None.
- i. See Appendix 6 for available analyses of the lagoon in the Fine Chemical Plant at closure time.

#### Request 28

Describe any records and recordkeeping practices that have ever been maintained relating to the disposal activities and answers described in responses 26 and 27.

## Response 28

Request 26 is well documented.

With respect to Request 27, most of the lagoons were constructed by Hooker-Detrex, and no records are available to DCI. See also Response 37.

# Request 29

Was DCI the owner of all of the described areas when it disposed of hazardous substances in them? If not, who was?

# Response 29

- (a) For State Road Property, refer to response 2 (A).
- (b) For Middle Road Property, refer to response 2 (B).

#### Request 30

Has DCI sold any part of the areas? If it has a sold part or all of the area, describe the portion of the areas sold, the date of sale, who the purchaser was and who the present owners are.

# Response 30

No parts of the areas have been sold except the Chlor-Alkali plant to Sobin Chemicals, Inc. in 1974. The present owners are Linden Chlorine Products, Inc.

#### Request 31

Has DCI disposed or arranged for the disposal of any materials in the Reserve Environmental Services, Inc. landfill in Ashtabula County, Ohio? If so, please state:

- a. When the disposal occurred.
- b. The nature of the solid wastes.
- c. The nature of the liquid wastes.

- d. Whether the waste contained hazardous substances.
- e. The amount of wastes involved.
- f. If known, where at Reserve's landfill the wastes were disposed.
- g. Describe all terms of any arrangement for the disposal of these materials.
- h. What records if any have ever been maintained documenting such disposal and arrangements for disposal.

#### Response 31

We have no records of dealing with Reserve Environmental Services in the landfill west of LaBounty Road.

We have arranged for disposal of materials thru Koski Construction Co. (which later changed its name to Reserve Environmental Services) at the landfill on the east side of LaBounty Road in Ashtabula County, Ohio.

- a. Approximate time: 1956 1975.
- b. We have no analysis of solids. Our best recollection is earth with solid calcium hydroxide and possibly some solid ferric chloride, ferric hydroxide and chlorinated hydrocarbons.
- c. We have no analysis of liquid wastes but our best recollection is that it is water containing dissolved Calcium hydroxide and possibly some dissolved ferric chloride, hydrochloric acid and some chlorinated hydrocarbons.
- d. See Items b. and c.
- e. No records kept.
- f. We have no records to indicate in what part of the landfill east of LaBounty Road the wastes were placed.
- g. Material was hauled by Koski in his trucks to his landfill. DCI paid for the hauling. No records of the amount paid for such services.
- h. None to the best of our knowledge.

#### Request 32

Has DCI ever observed any leachate escaping or being released from the DCI storage or disposal areas on property owned or operated by DCI? If so, describe the location and physical characteristics of the leachate such as color, odor or viscousness. When and by whom has this been observed?

# Response 32

No records have been found but it is recalled that, sometime during the period 1979 - 1981, a week of heavy rain washed out a part of the sidewall of pond/lagoon 3. A small amount of colorless, odorless liquid material came out of the lagoon and

was observed by Ohio EPA representatives who happened to be in the plant at the time. These representatives took samples of the liquid. Plant personnel immediately took eps to temporarily repair the lagoon wall and stop the escape of liquid. To our knowledge, none of this material entered Fields Brook and the incident was closed at that time. No results of any sample tests were received by DCI. Later on, a permanent repair was made using impervious clay brought in for that purpose.

#### Request 33

Do you have any information indicating that leachate from the DCI lagoon or other disposal areas may have escaped or been released into surrounding ditches, Fields Brook, or a tributary thereto? If so, please state it and include when such occurrences took place and who observed them.

#### Response 33

See Response 32 above.

# Request 34

It is U.S. EPA's understanding that DCI, in addition to the use of the landfill in the southwest corner of its property, disposed of still bottoms and other still residue elsewhere on or near its property. Describe those disposal processes, including:

- a. The years of operation of such disposal areas.
- b. The location of the disposal areas on or near the DCI property.
- c. The amounts and kinds of chemicals involved.
- d. The techniques used for disposal.
- e. Any records or recordkeeping practices that have ever been maintained for such practices.

#### Response 34

No still bottoms were disposed of in any landfill on the property.

Disposal of still bottoms from the chlorinated solvent process has already been addressed in Responses 17 (A) (1) and 37. In addition to these still bottoms disposed of in lagoons, still bottoms from the N-methyl pyrrole and pyrrole processes have also been disposed of as follows:

1958 - 1977 - Still bottoms were stored in drums on the premises.

After 1977, all bottoms which had been stored in drums were transferred to 45,000 gallon storage tank in a diked area and newly generated bottoms were also stored in that tank.

In September 1983 all of these bottoms manifested as F003 and F005 (approx. 30,000 callons) were transported by tanker to Hukill Chemical Company which arranged for the terial to be incinerated. DCI paid Hukill for this service. Since 1983 only a small amount of these still bottoms have been generated (30 drums). These materials have been transferred to Systech, Paulding, OH for incineration. No records have been maintained except the shipments and manifesting by Hukill and the manifesting of the material sent to Systech.

#### Request 35

Have soil samples been collected and analyzed or monitoring wells ever been installed in or adjacent to the property to monitor for releases of pollutants or hazardous waste constituents? If so, please provide any data or information you have from such monitoring activities.

#### Response 35

Soil samples were taken and analyzed when Burgess & Niple conducted a geological study in 1981.

Enclosed is a copy of the Burgess & Niple study and accompanying data. DCI previously forwarded copies to OEPA and USEPA. No monitoring wells have ever been installed in or adjacent to the property by DCI. (See Appendix 3)

In 1983 and 1984 CH<sub>2</sub>MHILL (contractor hired by USEPA) took soil samples from the 001 tributary as well as sediment samples from Fields Brook. USEPA did not report results to DCI.

# equest 36

Describe any other location on the DCI property located in the Fields Brook water basin at which wastes from DCI operations have been disposed. Please state the approximate time of disposal, the types of materials, their chemical characteristics and volumes involved. Also, provide information you have regarding sample analyses that have been conducted of materials in or adjacent to any other locations on the DCI property in the Fields Brook water basin at which wastes from DCI operations have been disposed.

#### Response 36

On the Southwest area of the property the dried, inert carbon catalyst from the "cracker" units and dry aluminum oxide catalyst used in the N-methyl pyrrole and pyrrole processes have been stored.

Ohio EPA has sampled and analyzed the carbon catalyst. DCI has sampled and analyzed the aluminum oxide catalyst. The analysis of the alumina and related correspondence is enclosed in Appendix 7. Neither of these materials were considered by EPA to be hazardous or toxic and the disposal method has been approved.

The carbon catalyst was placed as described above from approximately 1954 to 1971.

The aluminum oxide catalyst was placed from approximately 1956 to 1976.

No records of the volume of either catalyst have been kept. It is difficult to stimate the carbon catalyst, however, alumina catalyst volume was estimated at 30,000 lbs. for the period stated above. No disposal on the property or adjacent to it other than stated in this response.

# Request 37

Describe the location and size of each lagoon, pond, waste pile, trench or pit that sexisted on the DCI property and its purpose. For each lagoon, pond, waste pile, trench or pit describe:

- a. Any hazardous substances that may be, or have been, contained in them.
- b. The dates of each structure's existence and use.
- c. Any construction properties of each pit, pond, trench or lagoon which would help prevent the release of materials from it.
- d. If not in use now, explain how it was closed or has been modified and the present use of the area.
- e. Any pictures, sketches or maps of these facilities.

# Response 37

# (A) State Road Facility (State Road Plant)

Refer to attached drawing, Detrex SR1000-3 showing location of ponds/lagoons, waste pile and trench (Appendix 8).

# Ponds and Lagoons

- a. See responses 10 (A) (2), 17 (A) (1), 17 (A) (2) and 17 (A) (3).
- b. Ponds/lagoons #3 through #9 were constructed, used and their use discontinued by Hooker-Detrex prior to 1953. Ponds/lagoons #1 and #2 were constructed by Hooker-Detrex also and were used for several years after 1953 as settling ponds. Pond/lagoon #10 was constructed by Detrex and used during the last eight years of plant operation (1964-1972) to store the liquid still bottoms from the solvent residue recovery process.
- c. The entire DCI State Road property sits on a thick impermeable clay layer. When these ponds were formed this clay was used to form the walls by Hooker-Detrex.
- d. All ponds (except #2, #3, #7, #8 and #9) were cleaned by Koski Construction Company, capped with clay and planted with grass. Koski Construction Co. hauled the dredged material to their landfill on Middle Road.

Pond #2 (see Sketch 1000-3) which was identified in a 1975 report issued by the USEPA as Lagoon #6 was emptied by Browning & Ferris and hauled to their East Palestine, Ohio facility for disposal in 1976.

Prior to closing the number two pond, several hundred drums were crushed and buried in the bottom of this pond/lagoon with approval of Mr. D. Seeds of the Ohio EPA. This was performed in the spring of 1976 by digging to a depth of 6 ft. (after draining lagoon) and finally covering with 2 ft. of compacted clay and planted with grass as per Mr. Seeds' instructions.

During the period when the aforementioned ponds/lagoons were being closed, progress reports were submitted to Ohio EPA with a copy to D. Hatfield of the Federal EPA, Chicago strict office. The last report was sent on July 25, 1977 indicating work completed requested and, unless we received further word, we would consider the matter closed.

o further requests from EPA were received regarding the ponds/lagoons.

#### Waste Piles

See responses to 26 and 36.

# Ditches

Shown on Burgess & Niple drawing taken out of their 1981 report. See Appendix 5.

# (B) and (C) Middle Road Facility (Chlor-Alkali and Fine Chemicals Plants)

To the best of our recollection, there were three lagoons and a small concrete pit in this facility. Two large lagoons had a capacity of at least one million gallons each and were used for the Chlor-Alkali plant. The smaller lagoon had an estimated capacity of approximately 400,000 gallons.

We have no records on the closure of the two large lagoons in this facility, since this closure was carried out by one of DCI's successors after the 1974 sale.

The 400,000 gallons lagoon contained some of the Chlor-Alkali plant's effluent. After DCI leased the Fine Chemical plant from Sobin (after the facility sale in 1974), this plant's effluent was held in this lagoon also. In 1975, permission was given by Mr. Don Seeds of the OEPA to Browning & Ferris to empty this lagoon and haul the contents away in their truck to their East Palestine, Ohio for treatment and disposal. This was accomplished in 1975. For identification of effluents that went into this lagoon, refer to responses 16 (B), 16 (C), 17 (B) and 17 (C).

See Appendix 6 for the analysis of the lagoon contents.

# quest 38

Provide any information that you have concerning the disposal of hazardous substances from DCI operations at Reserve Environmental Services, Inc. including:

- a. description of the method of operation at the site (e.g. how drums were rinsed, materials used in drum cleaning, methods of disposal of waste residues from drums, disposal of rinse water, etc.)
- b. the disposal locations used by Reserve Environmental Services for residues, rinse water and solid wastes generated by their operations. This description should include locations both on and off their properties.
- c. the disposal locations for any drums discarded by the company.
- d. the estimated quantity of drums and waste residue disposed of at each location by the company.
- e. whether the company received drums for cleaning from persons other than DCI.

# Response 38

We have no knowledge of parts a, b or e.

- c. We did not dispose of any drums with Reserve Environmental. See response 31 for more details.
- d. Not applicable.

# Request 39

Provide the name of each customer from whom DCI has received hazardous substances or purposes of treatment or disposal, including incineration or reclamation. Further, provide any information you have on the kind of wastes received, the quantity of each kind of waste received, the processes involved with these wastes, the period during which each kind of waste was received and processed and the likely disposition of any residues from that process.

# Response 39

DCI Ashtabula has not received any hazardous substances from any outside sources for the purpose of treatment or disposal.

# Request 40

Provide copies of any documents that you now have that contain information indicating the receipt of hazardous wastes for reclamation, incineration, or other treatment by DCI. Such documents would include logs, invoices, bills of lading, purchase orders, work orders, trucking records, correspondence, contracts or other agreements.

#### Response 40

Not applicable.

#### Request 41

Provide the names of all other off-site facilities that have been used by DCI for the disposal of unreclaimed chemical wastes and hazardous wastes, incineration process astes and manufacturing process wastes. Provide the dates during which such disposal has occurred and the kinds of wastes sent to each facility.

#### Response 41

#### (1) Browning and Ferris

# (A) State Road Facility (State Road Plant)

The contents of pond No. 2 were hauled away in November 1976 and disposed of by Browning & Ferris in East Palestine, Ohio. The ponds/lagoons were then closed. For identification of the waste, refer to responses 17 (A) (1), (Except hexachlorobutane), 17 (A) (2) and 17 (A) (3).

Approximate date of disposal: 1976.

## (B) and (C) Middle Road Facility (Chlor-Alkali and Fine Chemical Plants)

There was one lagoon having an approximate capacity of 400,000 gallons that contained some of the Chlor-Alkali plant effluent as well as some of the Fine Chemical plant effluent. Browning & Ferris were given permission in early 1975 by Mr. Bon Seeds of OEPA to haul the contents away in their trucks to their East Palestine, Ohio facilities for treatment and disposal. They accomplished this in 1975. For analysis of contents, refer to Appendix 6.

Approximate date of disposal: 1975. For identification of waste, refer to responses 16 (B), 16 (C), 17 (B) and 17 (C).

# (C) Middle Road Facility (Fine Chemical Plant)

Browning & Ferris continued to haul the Fine Chemical effluent in their trucks for disposal to their East Palestine facilities through the years 1976, 1977, and 1978. In this period they picked up the effluent from the Fine Chemical concrete pit.

Approximate date of disposal: 1976, 1977 and 1978.

## (2) Rollins Environmental Services, Inc. (Bridgeport, NJ)

# (A) State Road Facility (State Road Plant)

Material sent: Hexachlorobutane

For details refer to Response 26.

Approximate date of disposal: March 1981 thru January 1982.

## (3) Hukill Chemicals

# (A) State Road Facility (State Road Plant)

Material sent: N-methyl pyrrole and pyrrole bottoms. Refer to the response to Request 34 for details. Approximate date of disposal: 1983

## (4) Systech

# (A) State Road Facility (State Road Plant)

Material sent: N-methyl pyrrole and pyrrole bottoms. Refer to response 34 for details. Approximate date of disposal: 1986

#### (5) Koski Construction Company

# (A) State Road Facility (State Road Plant)

Refer to the responses 17 (A) (1), 17 (A) (2), 17 (A) (3) and 31 for material identification and other details.

#### (6) Deerfield - Summit

#### (C) Middle Road Facility - Fine Chemical Plant)

Material sent: 16 drums of draker than specification Mandelic acid, and 32 drums of filter cake with traces of sulfurized material used as an additive in lubricating oils for gears.

On August 1979, the State of Ohio filed suit in Portage County Common Pleas Court against one Donald Georgeoff, Summit National Liquid Services, Inc. and others seeking to abate a public nuisance. Detrex entered into a Settlement with the State of Ohio for \$10,000 in spite of the fact that Detrex denied the allegation that Detrex was one of the companies that is liable for the nuisance conditions existing on the site.

Approximate date of disposal: March 26, 1976.

# (7) Doherty Landfill (Geneva, Ohio)

# (A) State Road Facility (State Road Plant)

All N-methyl pyrrole catalyst (alumina) was sent to this landfill after it was analyzed and the analysis submitted to Ohio EPA which stated that this material was not hazardous and could be disposed of in any licensed sanitary landfill. (Letter from Jack L. Burgan to C. Guy dated September 29, 1983). See Appendix 7 for further details.

Approximate date of disposal: 1983.

# Request 42

Provide any information you have regarding the waste disposal methods utilized by any surrounding property owners or users.

# Response 42

We have no knowledge of how other property owners handle their waste.

#### Request 43

Describe any information DCI may have obtained regarding contaminated fill material or debris deposited in or near Fields Brook or its tributaries. Such should include any information regarding fill allegedly disposed by Brenkus Excavating at or near the residence of Sandra Herl, 935 East 19th Street, Ashtabula, Ohio.

# Response 43

DCI has no information regarding contaminated fill material or debris deposited in the Fields Brook water shed or near the residence of Sandra Herl. DCI has not authorized Brenkus Excavating to remove any material from DCI property.

#### Request 44

Provide a list and description of all liability insurance coverage that is or was carried by you or any predecessor or successor corporations or partnerships, including any self-insurance provisions, that relates to hazardous substances and/or the above referenced sites. Provide copies of all of these insurance policies.

#### Response 44

DCI questions whether this information is relevant to the purposes of or is authorized by Section 104 of CERCLA (42 U.S.C. §9604). In any event, DCI has made demand on its insurance carriers and coverage currently is being contested.

Appendices are Seperate

# III. REQUEST FOR INFORMATION

- 1. Please provide the date, State of incorporation, Registered agent and his address for Elkem Metals Ohio (hereinafter referred to as EM).
- 2. Provide the addresses of all facilities owned or operated by EM in the Fields Brook water basin area in Ashtabula, Ohio.

  If any of the facilities that have been operated by EM, were not at all times of operation owned by EM, provide the name(s) of the other owner(s) of the facility and a description of each property's location.
- 3. If any of the property owned by EM in the Fields Brooks water basin has been sold, leased or interests in said property otherwise conveyed by EM to a third party or by a third party to EM, state that party's name and the dates of any conveyance or sale.
- 4. Provide a legal description of any EM facilities located in the Fields Brook water basin in Ashtabula County, Ohio.
- 5. Provide copies of any and all documents pertaining to the use and ownership of any EM facility or property in Ashtabula, Ohio including, but not limited to deeds, contracts, leases, subleases, purchase agreements and related correspondence.
- 6. It is U.S. EPA's understanding that Elkem Metals Company is successor to the Union Carbide Metals Division in Ashtabula,

# Ohio. Please provide the following:

M<sub>p</sub> = 1 5 C = 1 + 1

- a) The date of acquisition.
- b) The nature of the acquisition.
- c) The products produced at the facility before and after the acquisition
- d) EM's position regarding its assumption of liability for actions arising out of operations at the plant by Union Carbide.
- e) All documents regarding the change of ownership, including but not limited to contracts, deeds, leases, subleases, purchase agreements and correspondence.
- 7. Provide a list of all present and former plant managers, production managers and plant engineers at any of the above describe facilities. Please state the date of their employment with EM, positions held and last known addresses. Also, please indicate the numbers Requests regarding which they may have informations.
- 3. Provide the names of any predecessor or successor corporations or partnerships which owned or operated any EM facility, as described above, in Ashtabula County, Ohio.
- 9. On what date did EM commence operations of its facility at or near Lake Road in Ashtabula County, Ohio?
- 10. Provide any information you may have regarding contamination from your plant entering Fields Brook, or a tributary thereto, either directly or indirectly.
- 11. Provide any knowledge or information you may have regarding

any property owned by you in Ashtabula County, Ohio which may have been contaminated by prior owners or users. Your response should include, but not necessarily be limited to:

- a) Name of prior owner or user
- b) Use of facility and property by prior owners or users.
- c) Disposal practices of prior owners or users.
- d) Volume and nature of souces of such contamination.
- 12. Provide any information you may have regarding sources of contamination of Fields Brook.
- 13. Provide the following information regarding any french drains or sewer lines (including storm, sanitary or combined sewers) which receive or have received runoff or discharges from the property located near Lake Road in Ashtabula County, Ohio:
  - a) The location and nature of each sewer line.
  - b) Whether each sewer line is connected to the main trunk line.
  - c) Does any sewer line have direct or indirect access to Fields Brook or a tributary thereof?
- 14. Provide the following information regarding any drainage ditches which receive or have received runoff or discharges from the property located near Lake Road in Ashtabula County, Ohio:
  - a) The location of each drainage ditch.
  - b) Whether runoff or discharge from each drainage ditch has direct or indirect access to Fields Brook or a tributary thereof.

- c) Any information regarding the presence, or potential for releases, of hazardous substances or constituents in the ditches.
- 15) Does your company have, or did your company ever have, an NPDES permit for discharges to Fields Brook or a tributary thereto? Please identify any such permits.
- 16. Describe each manufacturing process that EM has operated at dach of its Ashtabula County, Ohio facilities, including the facility on Lake Road. For each facility and process provide the years that the operations occurred and all the raw materials associated with or relating to the process.
- 17. Describe each manufacturing process that Union Carbide operated at the facility to which EM is a successor in Ashtabula County, Ohio. For each process provide the years that the operations occurred and all the raw materials associated with or relating to the process.
- 18. Describe any hazardous substances that may have been contained in any by-products or wastes from each of the manufacturing processes described in Request 16 and 17. Also describe the amounts of wastes, by-products or hazardous substances generated by each of such processes on a yearly basis.
- 19. Describe the storage, treatment and disposal practices for any by-products or wastes associated with each of the manufacturing processes described in response to Request 15 and 16. This description should identify any use of drums, tanks, lagoons,

ponds, wastepiles, ditches, marshes, swamps, land treatment or disposal areas, public sewers, landfills, creeks, or waterways used or affected by such practices.

- 20. Describe the nature of any records and recordkeeping practices that have ever been maintained relating to any storage, treatment or disposal practices for any by-products or wastes associated with each manufacturing process in response to Requests 16 and 17.
- 21. Describe each chemical reclamation process that EM has operated at its Ashtabula, Ohio facilities. For each process state the years during which operation of the process occurred, the type of process equipment used, the types of chemical associated with each reclamation process and the volume processed annually by each process.
- 22. Describe the nature of any records and recordkeeping practices that have ever been maintained relating to the characteristics and nature of the wastes or by-products described in response to Request 21.
- 23. Describe the characteristics and nature of wastes or byproducts associated with each reclamation process. Such
  description should include any characteristic or listing that
  such waste would likely have under 40 CFR Part 261. The description should also include any hazardous substances the

waste would likely contain.

- 24. Describe the nature of any records and recordkeeping practices that have ever been maintained relating to the characteristics and nature of the wastes or by-products described in response to Request 23.
- 25. Describe the practices and conditions relating to the storage of hazardous wastes or hazardous substances upon their arrival at EM's Ashtabula County, Ohio facilities, until the time of their reclamation. Such a description should include, along with any dates when any significant changes occurred:
  - a. what types of wastes were/are stored in drums.
  - b. what types of wastes were/are stored in tanks.
  - c. what type of containment system for spills or releases were provided at the storage areas.
  - d. the location of any storage areas.
  - e. whether drums have been marked with the generator or transporter's name.
  - f. whether hazardous waste from more than one source were ever mixed or commingled together in a tank. How frequent was this practice? Did this include emptying drums into tanks?
  - g. what was the practice regarding the cleanup of spilled materials from these stored hazardous wastes.
  - h. did spills or releases (including those caused by fire) of these materials ever occur while they are awaiting processing.
  - i. whether such wastes were ever stored in lagoons or ponds.
  - j. what types of such wastes were stored in lagoons or ponds.

- k. what types of liners or any other impervious barriers did lagoons or ponds have to prevent release of the materials.
- what types of wastes, if any, were ever stored in waste piles.
- m. what records and recordkeeping practices have ever been maintained on storage. What is the state of those records?
- 26. Describe EM's practices relating to the disposal and treatment of still bottoms sludges and other non-reclaimed materials accumulated in any reclamation process itself. Please include in such a description, along with the dates for different practices:
  - a. whether the non-reclaimed materials were drummed up for disposal.
  - b. If such non-reclaimed materials were drummed up, whether they were normally [or necessarily] put back in the drums of the seller from whom they originated.
  - c. Whether the non-reclaimed material was allowed to accumulate and was stored prior to treatment or disposal.
  - d. the locations and types of storage areas used for storage of the non-reclaimed materials. Examples of types of storage areas could include drums, tanks, pits, wastepiles, ponds or lagoons.
  - e. any containment systems utilized at these storage areas to help prevent releases of the stored material to the environment.
  - f. whether any spills or releases of these stored materials ever occurred. Approximately when.
  - g. where and how such materials were disposed.
  - h. what records and recordkeeping practices that have ever been maintained in regard to the above practices.

- 27. Describe practices relating to any incineration processes used for disposal of wastes from each of EM's Ashtabula, Ohio facilities. This description should include:
  - a. the location and years during which each incinerator operated.
  - b. the rated capacity for each incinerator.
  - c. the normal operating and peak temperature for each incinerator.
  - d. the rated retention time for materials during the burn.
  - 'e. the type of fuel used to bring the incinerator up to operating capacity.
  - f. how the material was fed to the incinerator.
  - g. what types of operating records were kept including temperature and feed rate.
  - h. the types of air pollution control devices that were installed on each incinerator and stack test results.
  - i. whether any misting or raining from the incinerator stacks ever occurred.
  - j. what quantities of incinerator ashes or sludges were generated from the incineration processes.
  - k. what types of materials and volumes were burned in these incinerators.
  - were any PCBs known to have been burned in these incinerators.
  - m. did the materials that were burned include non-reclaimable materials from stills.
  - n. was materials from stills accumulated and stored prior to incineration.
  - o. did the materials sent to DS, include materials sent there solely for purposes of incineration.
  - p. Were materials sent to EM for incineration on

occasion otherwise disposed. How and why?

- q. how and where were by- products of the incineration process (including ash bottoms, flysash, sludges and scrubber water) disposed.
- r. any records and recordkeeping practices that have been maintained relating to the described practices. What is the state of those records?
- 28. Has EM ever observed any Leachate escaping or being released from any storage or disposal areas on product owned or operated by EM in Ashtabula County, Ohio? If so, describe the physical characteristics of the leachate such as color, odor or viscuousness. When and by whom has this been observed?
- 29. Do you have any information indicating that Leachate from any of the storage or disposal areas on property owned or operated by EM may have escaped or been released into surrounding ditches, Fields Brook, or a tributary thereto? If so, please state it and include when such occurrences took place and who observed them.
- 30. Have soil samples been collected and analyzed or monitoring wells ever been installed in or adjacent to the property near Lake Road, Ashtabula County, Ohio, to monitor for releases of pollutants or hazardous waste contituents? If so, please provide any data you have from such monitoring activities.
- 31. Describe any location on the EM property located in the Fields Brook water basin at which wastes from EM operations have been disposed. Please state the approximate time of disposal, the types of materials, their chemical characteristics

and volumes involved. Also, provide any information you have regarding sample analyses that have been conducted of materials in or adjacent to any other locations on the EM property at which wastes from EM or Union Carbide operations have been disposed.

- 32. Describe the location and size of each lagoon, pond, waste-pile, trench or pit that has existed on the EM Lake Road property and its purpose. For each lagoon, pond, wastepile, trench or pit describe:
  - a. Any hazardous substances that may be or have been contained in them.
  - b. The dates of each structure's existence and use.
  - c. Any construction properties of each pit, pond, wastepile, trench or lagoon which would help prevent the release of materials from it.
  - d. If not in use now, explain how it was closed or has been modified and the present use of the area.
  - e. Any pictures, sketches or maps of these facilities.
- 33. Provide the name of each customer from whom EM has received hazardous substances for purposes of treatment or disposal, including, incineration or reclamation. Further provide any information you have on the kinds of wastes received, the quantity of each kind of waste received, the processes used by EM in handling these wastes, the period during which each kind of waste was received and processed and the likely disposition of any residues from that process.
- 34. Provide copies of any documents that you now have that contain information indicating the receipt of hazardous wastes

for reclamation, incineration, or other treatment by EM. Such documents would include, logs, invoices, bills of lading, purchase orders, work orders, trucking records, correspondence contracts or other agreements.

- 35. Provide the names of all other off-site facilities that have been used by EM for the disposal of unreclaimed chemical wastes and hazardous wastes, incineration process wastes and manufacturing process wastes. Provide the dates during which such disposal has occurred and the kinds of wastes sent to each facility.
- 36. Describe any information EM may have obtained regarding contaminated fill material or debris deposited in or near Fields Brook or its tributaries. Such should include any information regarding fill allegedly disposed by Brenkus Excavating at or near the residence of Sandra Herl, 935 East 19th Street, Ashtabula, Ohio.
- 37. Provide a list and description of all liability insurance coverage that is or was carried by you or any predecessor or successor corporations or partnerships including any self-insurance provisions that relate to hazardous substances and/or the above referenced sites. Provide copies of all of these insurance policies.
- 38) Provide any information you have regarding the waste disposal methods utilized by any surrounding property owners or users.

- 39) Has EM disposal or arranged for the disposal of any materials in the Reserve Environmental Services, Inc. disposal facility located in Ashtabula County, Ohio? If so, please state:
  - a. When the disposal occurred.
  - b. The nature of the solid wastes.
  - c. The nature of the liquid wastes.
  - d. Whether the wastes contained hazardous subsances.
  - e. The amount of wastes involved.
  - f. If known, where at the Reserve disposal for the disposal facility the wastes were disposed.
  - g. Describe all terms of any arrangement for the disposal of these materials.
  - h. What records, if any, have ever been maintained documenting such disposal and arrangements for disposal? What is the state of those records?
- 40) Provide any information that you have concerning the disposal for hazardous substances from operations at Reserve Environmental Services, Inc. including:
  - a) description of the method of operations at the site (e.g. how drums were rinsed, materials used in drum cleaning, methjods idsposal of waste residues from drums, disposal of rinse water, etc.)
  - b. the disposal locations used by Reserve Environmental Services for residues, rinse water and solid wastes generated by their operations. This description should include location both on and off their properties.
  - c) the disposal locations for any drums discarded by the company.
  - d) the estimated quantity of drums and waste residue disposed of at each location by the company.
  - e) whether the company received drums from persons other than EM for cleaning.

STATE OF MICHIGAN

NATURAL RESOURCES COMMISSION
THOMAS J. ANDERSON
MARLENE J. FLUHARTY
GORDON E. GUYER
KERRY KAMMER
O. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE



JAMES J. BLANCHARD, Governor

#### DEPARTMENT OF NATURAL RESOURCES

Gorden E. Guyer, Director S.E. Michigan Field Office 15500 Sheldon Road Northville, MI 48167

June 11, 1986

Mr. Michael Tepatti Gold Shield Solvents/Detrex Chemical 12886 Eaton Avenue Detroit, MI 48227

RE: MID 091605972

Dear Mr. Tepatti:

On June 3, 1986, acting as a representative of the United States Environmental Protection Agency, I performed an inspection of your facility located at the above address to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

I have determined that your facility has no deficiencies of the requirements of RCRA in the areas reviewed during that inspection.

Sincerely,

Faye Dade

Hazardous Waste Division

FD/aw

cc: U.S. EPA, Region V

B. Okwumabua

RCRA INSPECTION REPORT

EPA Identification Number: <u> </u>	1009160	25772
Installation Name: Gold	Shield Solvents/ D.	etrex chemical
Location Address: 128	86 Eston Ave	
city: Detroit	State: MI	48227
Date of Inspection Jake 3, 48	Time of Inspection (f	from) (to) /0 4
Person(s) Interviewed  Mike Tepathi	Title MANAGER	Telephone 313-391-3428
•		· · · · · · · · · · · · · · · · · · ·
,		
Inspector(s) FAUG DPDE	Agency/Title MONR/EQA	Telephone 313-459-918()
Installation Activity (mark only	one box)	Inspection Form(s)
Treatment/Storage/Disposal po Generation and/or Transporta	er 40 CFR §265.1 and/or tion	Α
Treatment/Storage/Disposal (	No Generation or Transportati	on) A
Generation and Transportation	n .	B,C
Generation Only		В
Transportation Only		. <b>C</b>

#### INSPECTION FORM A

# Section A: SCOPE OF INSPECTION.

- 1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
- 2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

<u>Permit app</u>	licatio	n process(es) (EPA Form 3510-3) Ins	pection Form	A section(s)
\$0		storage in containers		I
so	2 💢	storage in tanks		J
TO	ı II	treatment in tanks		J
	4 🎞	storage in surface impoundment		K,F
то	2	treatment in surface impoundment		K,F
D8	3 ]	disposal in surface impoundment		K,F
. 50	3 📘	storage in waste pile		L
D8	ī	disposal by land application.		M,F
D8	0 ]	disposal in landfill		N,F
. то	3 🎞	treatment by incineration		0/P
то	4 📈	treatment in devices other than tanks impoundments, or incinerators	s, surface	Q
Other activiti	<u>es</u>	solvent reclamation		
GENERAT	OR I		APPENDIX	GN
TRANSPORT	ER Z		APPENDIX	TR

- Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
- 4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

1.		the Designal Administrator				
	bee	the Regional Administrator notified regarding: 265.12			·	
	ā.	Receipt of hazardous waste from a foreign source?	·	<u>~</u>		
	b.	Facility expansion?	<u> </u>		<del></del>	wants to use K capperty
	c.	Change of owner or operator?			<u>N</u> A.	1
2.	Gen	eral Waste Analysis: 265.13				•
•	<b>a.</b>	Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<u></u>	,		•
	b.	Does the owner or operator have a detailed waste analysis plan on file at the facility?	u			
)	<b>c.</b>	Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	V			•
3.	Sec	urity - Do security measures include (if applicable) 265.14	e:		· ·	
	a.	24-Hour surveillance?	<u>~</u>			ADI to System
	b.	i. Artificial or natural barrier around facility?	V.	·		Security Bldg.
		and ii. Controlled entry?	· ·			
	c.	Danger sign(s) at entrance?	1			
4.	0wn	er or operator inspections: 265.15		•		
	a•	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or the environment?		,		

4/82-A

\*Not Inspected

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

		AF2 NO NI	Remarks *
	b. Does the owner or operator have an inspection schedule at the facility?		· · · · · · · · · · · · · · · · · · ·
	c. If so, does the schedule address the inspection of the following items:		<b>S</b> C
Ċ	i. monitoring equipment?		Monitoris est
	ii. safety and emergency equipment?	<u> </u>	- <del></del>
	iii. security devices?	<u>~</u>	
•	<pre>iv. operating and structural equip- ment (i.e. dikes, pumps, etc.)?</pre>	<u> </u>	
4	v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	<u></u>	
	vi. inspection frequency (based upon the possible deterioration rate of the equipment)?	V	
٠	d. Are areas subject to spills inspect- ed daily when in use?		
	e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?	<u></u>	
	f. Does the inspection log contain the following information:		
	i. the date and time of the inspection?	<u> </u>	-
	ii. the name of the inspector?	<u> </u>	
	<pre>iii. a notation of the observations   made?</pre>	<u></u>	
	<pre>iv. the date and nature of any     repairs or remedial actions?</pre>		
5.	Do personnel training records include: 265.16		
	a. Job titles?	$\nu$ – –	
	b. Job descriptions?	<u>_</u> _	

	•	123 110	14.7	(Charks
c.	Description of training?	<u></u>		
d.	Records of training?	<u></u>		
e.	Did facility personnel receive the required training by 5-19-81?	-	<u>~</u>	
f.	Do new personnel receive required training within six months?	<u></u>		
g.	Do personnel training records indicate that personnel have taken part in an annual review of initital training?	V		
req	required, are the following special uirements for ignitable, reactive, incompatible wastes addressed? 265.1	7		no ignitione resultive.
a.	Special handling?		+	no is percio
b.	No smoking signs?			pec up tel.
c.	Separation and protection from ignition sources?			· pcc H

# Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1. Maintenance and Operation of Facility: 265.31  Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste or hazardous waste constituent?  2. If required, does the facility have the following equipment: 265.32  a. Internal communications or alarm systems?  b. Telephone or 2-way radios at the scene of operations?  c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?  Indicate the volume of water and/or foam available for fire control:  3. Testing and Maintenance of Emergency Equipment: 265.33  a. Has the owner or operator established testing and maintenance procedures for emergency equipment?  b. Is emergency equipment maintained in operable condition?  4. Has owner or operator provided immediate access to internal alarms? (if needed) 265.34  5. Is there adequate aisle space for unobstructed movement?  6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?			•			
hazardous waste or hazardous waste constituent?  2. If required, does the facility have the following equipment: 265.32  a. Internal communications or alarm systems?  b. Telephone or 2-way radios at the scene of operations?  c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?  Indicate the volume of water and/or foam available for fire control:  3. Testing and Maintenance of Emergency Equipment: 265.33  a. Has the owner or operator established testing and maintenance procedures for emergency equipment?  b. Is emergency equipment maintained in operable condition?  4. Has owner or operator provided immediate access to internal alarms? (if needed) 265.34  5. Is there adequate aisle space for unobstructed movement?  6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency	1.	of Facility: 265.31  Is there any evidence of fire,	YES NO	NI	Remark s	
a. Internal communications or alarm systems?  b. Telephone or 2-way radios at the scene of operations?  c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?  Indicate the volume of water and/or foam available for fire control:  3. Testing and Maintenance of Emergency Equipment: 265.33  a. Has the owner or operator established testing and maintenance procedures for emergency equipment?  b. Is emergency equipment maintained in operable condition?  4. Has owner or operator provided immediate access to internal alarms? (if needed) 265.34  5. Is there adequate aisle space for unobstructed movement?  6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency		hazardous waste or hazardous				
alarm systems?  b. Telephone or 2-way radios at the scene of operations?  c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?  Indicate the volume of water and/or foam available for fire control:  3. Testing and Maintenance of Emergency Equipment: 265.33  a. Has the owner or operator established testing and maintenance procedures for emergency equipment?  b. Is emergency equipment maintained in operable condition?  4. Has owner or operator provided immediate access to internal alarms? (if needed) 265.34  5. Is there adequate aisle space for unobstructed movement?  6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency	2.		32 -			
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3. Testing and Maintenance of Emergency Equipment: 265.33  a. Has the owner or operator established testing and maintenance procedures for emergency equipment?  b. Is emergency equipment maintained in operable condition?  4. Has owner or operator provided immediate access to internal alarms? (if needed) 265.34  5. Is there adequate aisle space for unobstructed movement?  6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency	•	fire control, spill control equipment and decontamination	<u>~</u>	· · · · · · · · · · · · · · · · · · ·		· · · · · · · · · · · · · · · · · · ·
a. Has the owner or operator established testing and maintenance procedures for emergency equipment?  b. Is emergency equipment maintained in operable condition?  4. Has owner or operator provided immediate access to internal alarms? (if needed) 265.34  5. Is there adequate aisle space for unobstructed movement?  6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency		Indicate the volume of water and/or	foam available	e for fi	re control:	<del></del>
established testing and maintenance procedures for emergency equipment?  b. Is emergency equipment maintained in operable condition?  4. Has owner or operator provided immediate access to internal alarms? (if needed) 265.34  5. Is there adequate aisle space for unobstructed movement?  6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency	3.					
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immediate access to internal alarms? (if needed) 265.34  5. Is there adequate aisle space for unobstructed movement?  6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency		maintained in operable	<u></u>	*******		
for unobstructed movement?  6. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency	4.	immediate access to internal	<u>/_</u>	<b>CONTRACTOR</b>		
to make arrangements with local authorities in case of an emergency	5.		V_			<u></u>
	6.	to make arrangements with local authorities in case of an emergency	<u>/_</u>			

# Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

YES NO NI Remarks

- Does the Contingency Plan contain the following information: 265.52
  - a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
  - b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
  - Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
  - d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
  - e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)
- 2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

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1/_		 

		AF2 MA	N 1	Kemarks
3.	Emergency Coordinator 265.55			
	a. Is the facility Emergency Coordinator identified?			
	b. Is coordinator familiar with all aspects of site operation and emergency procedures?	<u>v</u> _		
	c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<u></u>		
4.	Emergency Procedures 265.56			•*
•	If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?		<u>√</u>	nuemensincy occurol

			Section	E: MANIF	EST SYSTEM,	RECO	RDKEE	PING,	AND F	REPORTIN	<u>G:</u> (Part	265 S	ubpart	E)
							YES	NO	NI	Rema	rks			
* 1.	Use	of	Manifest	System	265.71			-	•					
	<b>a.</b>	pro pro (Pa the gen	ocessing of articular e signed o	listed in each mani ly sendin manifest	§265.71 fo		<u> </u>							
	<b>b.</b>		e records tained fo				V	_		•				
<b>*</b> 2.	req	uir	ne owner o ements re pancies?		a <sub>nifes</sub> t							- -		·
of	f on-s	ite	able to on facilition waste fi	es that d		•i					,			
3.	. Ope	rat	ing Record	265.73										
	đ.	ma rec	es the own intain an cord as ro 5.73?	operating	9		$\underline{\nu}$							-
	b.	CO	es the opentain the formation	following										
	·	i.	of each storage	, or dispo	treatment,		V	_						
•		ii.	each had facility should to to spec	zardous wa /? (This de cross- ific mani e was acco	quantity o aste within informatio referenced fest number ompanied by	the n								

\*\*\*iii. A map or diagram of each cell or disposal area

	•		•	YES	NO	NI	Remarks
			showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)		•	. <del> </del>	
	i	٧.	Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	<u></u>	<u></u>		
•		٧.	Reports detailing all incidents that required implementation of the Contingency Plan?			<u>~</u>	
		i.	All closure and post closure costs as applicable?	4	<u> </u>		
	Avai	lab	ility of Records 265.74				
	unde	r 4	facility records required O CFR Part 265 available for ion?	V	_		
*	*Unma	nif	ested Waste Reports 265.76	•			
		haz. gen	the facility accepted any ardous waste from an off-site erator subject to 40 CFR 262.20 hout a manifest or or shipping er?		Ľ		All nomings te monifested
		of desc and	"a" is yes, provide the identity the source of the waste and a cription of the quantity, type, date received for each unmanited hazardous waste shipment.				

<sup>\*\*</sup> Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

## Section G CLOSURE AND POST CLOSURE (Part 55 Subpart G)

YES NO

NI

Remarks

•	C1 c	sure	265	5.112						
	a.			acility closure ilable for inspection?	K		<del> </del>			
	ь.	Doe	s the	plan identify:						
4		i.		num extent unclosed dur- facility life?	<u></u>		<del></del>			
		ii.	maxi vent	mum hazardous waste in- ory?	<u>~</u> _	· ·		·		
		iv.	esti	mated year of closure?	K-		<del></del>			·
	-	٧.	sche	dule of closure activities?			-	· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·	
•	c.	Has	clos	ure begun?	Ł				•	
•	Pos	st-Cl	osure	265.118						
	a.		-	ost-closure plan available ection?					<del>- ,</del>	
	b.	Does	s this	s plan contain:		· •	•	•		
		i.	monit	ription of groundwater toring activities and uencies?		_			·	
		ii.		ription of maintenance vities and frequencies	·					
	·		AA.	integrity of cap, final cover, or containment structures, where applicable			<del></del>			
				facility monitoring equip- ment						
	į	iii.	of pe	, address, and phone number erson or office to contact ng post-closure care period?		-				
	c.	Has	the p	post-closure period begun?						
	d.			ritten post-closure cost available? 265.144			-			

# Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

	·	YES N	IN C	Remarks
i <b>.</b>	Are containers in good condition? 265.171	K		
2.	Are containers compatible with waste in them? 265.172	<u> </u>	, 	
3.	Are containers managed to prevent leaks? 265.173	V_		
1.	Are containers stored closed?	V	<del>-</del>	
5.	Are containers inspected weekly for leaks and defects.	<u>/</u> _		
5.	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).	265.176	Mp	
7.	Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177			
8.	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?			

# Section J - TANKS (Part 265, Subpart J)

YES NO NI Remarks

1.	Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192
2.	Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures?  **Cove feet**  **Cov
3.	Do continuous feed systems have a waste-feed cutoff?
4.	Are waste analyses done before the tanks are used to store a substantially different waste than before?
5 <b>.</b>	Are required daily and weekly inspections done? 265.194
6.	Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? 265.198  Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)  Are incompatible wastes
7.	Are incompatible wastes stored in separate tanks? 265.199 (If not, the provisions of 40 CFR 265.17(b) apply.)
8.	Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?
	Tank capacity:gallons
	Tank diameter:feet
	Distance of tank from property line feet
	(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids

#### Appendix GN

Section A:	Scope
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 Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

3666	1011	b. Thirties Regardenents (1 at c 202, Suppar	C D )			
		•	YES	NO	NI	Remark s
(1)		es the operator have copies of the manifest ilable for review? 262.40	¥	_		
(2)	mon	mine manifests for shipments in past 6 ths. Indicate approximate number of diffested shipments during that period.	<u>15</u>	<b>,</b>		
(3)	fol cop fes	the manifest forms examined contain the lowing information: (If possible, make lies of, or record information from, manitis) that do not contain the critical ments). 262.21				
	a.	Manifest document number?		_		***************************************
	b.	Name, mailing address, telephone number, and EPA ID number of Generator	V	<u></u>		
	c.	Name and EPA ID Number of Transporter(s)?	<u>v</u>			
	d.	Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<u> </u>	_	· .	
-	e.	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?				
	f.	The total quantity of waste(s) and the type and number of containers loaded?	<u>~</u>	· ·		
•	g.	Required certification?	1	<b>7</b>		
	h•	Required signatures?	6			·.
(4)	Rep	ortable exceptions 262.42				

- a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment.
- b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator.

# Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

			YES	NO	NI	Remarks
		waste packaged in accordance				
		h DOT regulations? equired prior to movement of				
		ardous waste off-site) 262.30	•			Dult of
		202.30				1 min
2.		waste packages marked and labeled				pare
		accordance with DOT regulations				
		cerning hazardous waste materials? quired for movement of hazardous			1 /	
		te off-site) 262.31 262.32			$\mathcal{U}$	17
				7		
3.		required, are placards available to	1/			· · · · · · · · · · · · · · · · · · ·
	tra	nsporters of hazardous waste? 262.33	$\underline{\nu}$			
4.	0n-	site accumulation of generated hazardous was	tes. A	HWMF	may a	ccumulate hazardous
	' was	te it generates either (A) in its storage fa	cility.	[265.	1(b)]	or (B) in accordance
	wit	h 40 CFR 262.34 [see 265.1(c)(7)]. Option B	restri	cts a	11 acc	umulation to tanks
	and	containers. If the installation elects opt	ion A,	check	this	box and skip
		Section D. If the installation elects options: See 40 CFR 262 34 January 11, 1982 Rev		mplet	e tne	Tollowing observa-
		ns: See 40 CFR 262.34 January 11, 1982 Rev	1510n			• •
	a.	Is each container clearly marked				
		with the start of accumulation				
		date?				
	Ь.	Have more than 90 days elapsed since				
	٠.	the date inspected in (a)?				
					<del></del>	
	C.	Do wastes remain in accumulation tanks				Less godays
		for more than 90 days?		<u>K</u>		than 9001
	d.	Is each container and tank labeled or				
	_	marked clearly with the words "Hazardous				
		Waste"?	<u> </u>			
500	+ i on	D. DECODDREEDING AND DEPORTING (Dame 262	Subnan	+ n)		
260		D: - RECORDKEEPING AND REPORTING (Part 262,	Subpar	נטן		
			YES	NO	NI	Remarks
1.		all test results and analyses				
		ded for hazardous waste deter-		/		
		ations retained for at least	1/			. •
	CIII	ee years? 262.40				
Sec	tion	E: - INTERNATIONAL SHIPMENTS (Part 262, Sub	part E)			
,	محالا	the installation imported on				
1.		the installation imported or orted Hazardous Waste? 262.50				***
	CVP	orden mazar dous master zuz.30	. —	*		
-		answered Yes, complete the following				
	as	applicable.)				
	a.	Exporting Hazardous waste; has a				•
		generator:		•		

		YES	NO	NI	Remarks
Not	tified the Administrator in iting?				· .
ii.	Obtained the signature of the foreign consignee confiming delivery of the waste(s) in the foreign country?	-			-
iii.	Met the Manifest requirements?				
Impor	ting Hazardous Waste; has				,

b. Importing Hazardous Waste; has the generator met the manifest requirements?

# Appendix TR

Sec	tion A: SCOPE:	YES	NO	NI	Remarks		
1.	Complete this Appendix if the owner or operator transports hazardous waste subject to 40 CFR 263.10.						
2.	Does the transporter transport hazardous waste into the U.S. from abroad?		L	_			·
. 3.	Does the transporter transport hazardous waste out from the U.S.?		<u>~</u>				
4.	Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	******	K			<del></del>	·
Sec	tion B: MANIFEST SYSTEM AND RECORDKEEPING	(Part	263	Subp	art B)		
1.	Are copies of <u>completed</u> manifests available for review and retained for three years. 263.22	<u>~</u>	<u></u>				: -
2.	Estimate the number of manifests for shipments completed during the part 6 months.	·	100	18	•		
3.	Examine a representative number of manifests. Indicate number examined.	******					
4.	Did transporter properly sign and date the manifests examined?	K					
5.	Do any manifests indicate shipments delivered to other than the designated facility? 263.21						,
	If (5) is "no," skip 6 and 7.					<del></del>	<del></del>
6.	Do any manifests indicate shipments delivered to other than an alternate facility?						
7.	Are shipments delivered to alternate facilities only because emergency prevents delivery to the designated facility?						

TR-1

### **DEC** 0 2 1985

Mr. Alan J. Howard Chief, Technical Services Section Hazardous Waste Division Michigan Department of Matural Resources P.O. Box 30028 Lansing, MI 48909

> PE: Detrex Chemical Industries Detroit, MI MID 091 605 972

Dear Mr. Howard:

Enclosed is one copy of a request for an increase in capacity for the above referenced facility. Please perform a technical evaluation of the request, and provide us your comments by January 10, 1986.

If you have any questions, please contact Randi Kim of my staff, at (312) 886-6151.

Singerely,

George J. Hamper Acting Chief, Michigan Unit

**Faclosure** 

cc: Mary Higgins
HWEMS Update File

5HS-JCK-13:MMD:SWB:TPS:MI:R.KIM:J.DAVIS:DRAFT 11/19/85:FIRAL 11/25/85

Contract on the Contract of th	TYP.	AUTU.	<b>1</b>	M.			and a service street and per-	
	125 1285	Pro S		To the production of the	JAS 11-AS	<b>'</b>		an area to see it

STATE OF MICHIGAN



S.E. Michigan Field Office 15500 Sheldon Road Northville, MI 48167

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON E. R. CAROLLO MARLENE J. FLUHARTY STEPHEN F. MONSMA O. STEWART MYERS RAYMOND POUPORE HARRY H. WHITELEY

JAMES J. BLANCHARD, Governor

#### **DEPARTMENT OF NATURAL RESOURCES**

RONALD O. SKOOG, Director

November 25, 1985

Mr. Michael Tepatti Gold Shield Solvents Division of Detrex Chemical Industries, Inc. 12886 Eaton Avenue Detroit, Michigan 48227

Re: MID 091605972

Dear Mr. Tepatti:

This letter is to acknowledge receipt of your letter dated November 18, 1985, indicating your compliance program for RCRA deficiencies cited during my inspection on November 6, 1985. I consider your response acceptable at this time and will evaluate the adequacy of your program during future inspections.

Thank you for your cooperation. If you have any questions, please feel free to contace me at (313) 459-9180.

Sincerely.

Margaret A. Field's

HAZARDOUS WASTE DIVISION

MAF:m1m

cc: U.S. EPA, Region V

B. Okwumabua



# GOLD SHIELD SOLVENTS

Division of Detrex Chemical Industries, Inc.

12886 EATON AVE., DETROIT, MICHIGAN 48227

AREA CODE 313 TELEPHONE 491-4550

November 18, 1985

Ms. Margaret A. Field's
Michigan Department of Natural Resources
Hazardous Waste Division
S.E. Michigan Field Office
15500 Sheldon Road
Northville, Michigan 48167

Re: MID 091605972

Dear Ms. Field's:

In response to your letter of November 14, 1985, concerning your inspection of our facility at 12886 Eaton Avenue for compliance with RCRA requirements, and the two (2) deficiencies found, the following corrective action has been taken.

- 1). The five (5) "Danger-Unauthorized Personnel Keep Out" signs that were removed during garage door replacement and building painting, have been purchased, received, and installed. A copy of American Lablemark Companies packing list is attached.
- 2). An annual review of the Company's Hazardous waste management facility employee training program was held on November 13, 1985, and a copy of the signed statement indicating same is attached.

In addition, our 1958 Kingham Platform Trailer will be inspected by the Motor carrier safety division of the Michigan State Police in the near future and a copy of this inspection will be included with our renewal for license.

If you have any questions or require any additional information, please call me at your convienance.

Very truly yours,

Michael J. Tepatti, Gold Shield Solvents

Michigan Regional Manager.

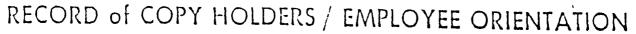
NOV 1 9 1985

TARNOUS WASTE .

CC: W. G. Robrecht

C. Guy File Annual Deview - Detrex Chemical Industries, Inc.

# HAZARDOUS MASTE MANAGEMENT FACILITY EMPLOYEE TRAINING PROGRAM





### PLEASE COMPLETE APPROPRIATE SECTION OR SECTIONS

1. SUPERVISOR ACKNOWLED	GMENT	•
NAMEHAZARDOUS HASTE MANAGEMENT	l acknowledge that FACILITY EMPLOYEE TRAINING	I have received my copy of the Company's PROGRAM OF JULY 26, 1985.  DATE
HAZARDOUS WASTE HAMAGEMENT WERE EXPLAIMED, DISCUSSED  R. Barmore  L. Douglass  B. Hooper	. at a meeting with the following e	employees line contents of the Company's  S PROGRAM OF JULY 26, 1905  DATE  11-14-85  11-14-85  11-14-85
	US MASTE MANAGEMENT FACICLT IN TO THE FOLLOWING EMPLOYE	Y EMPLOYEE TRAINING PROGRAM ES:
	DATE	DATE
·	SUPERVIŜOR	UAI:
to PROGRAM OF JULY 26, 19  5. I acknowledge that I have studi	on	TE MANAGEMENT FACILITY #
		DATE



# American Labelmark Co., Inc. PAGE

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48227

GOLD SHIELD SOLVENTS 12886 EATON AVENUE DETROIT MI

48227

ORDER ***	DATE OF ORDERA	CUSTO	MER ORDER NO.		Translanding Alice Aluxus	
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etrex Chemical Industries, Inc

# HAZARDOUS MASTE MANAGEMENT FACILITY EMPLOYEE TRAINING PROGRAM ...





PLEASE COMPLETE APPROPRIATE SECTION OR SECTIONS

1. SUPERVISOR ACKNOWLE	DGMENT		
NAME MTCHAEL J. TEPATI HAZARDOUS LIASTE MANAGEME			d my copy of the Company's F JULY 26, 1935.  DATE Nov. 11, 198
2. EMPLOYEE ORIENTATIO	N		
HAZARDOUS WASTE MANAGEMENTERE EXPLAIMED, DISCUSSE	, at a meeting with the INT FACILITY EMPLOYEE D AND QUESTIONS ANSWE	TRAINING PROGRAM O	
	SUPERVI	sor	
3. OTHER COPY HOLDERS  Copies of the Company's HAZAR  OF JULY 26, 1985 WERE G	DOUS MANAGEMENT		TRAINING PROGRAM
L. Douglass	DATE Nov.11,1985	B. Hooper	DATE Nov. 11, 1985
R. Barmore	DATE NOV.11,1985	R. Smith	DATE Nov.11,1985
G. Seretian	DATE NOV.11,1985	M. O'Connor	DATE_Nov.11, 1985
	SUPER	visor Apolad	Wyoth :
4. NEW EMPLOYEES			· · · · · · · · · · · · · · · · · · ·
A. A copy of the Company's 1 PROGRAM OF JULY 26,			OYEE TRAINING
	. SUPER	VISOR	
3. I acknowledge that I have s EMPLOYEE TRAINING PI	tudied the Company's HAZARD ROGRAM OF JULY 26, 198		NT FACILITY /
	•		DATE

NATURAL RESOURCES COMMISSION
THOMAS J. ANDERSON
MARLENE J. FLUHARTY
LEPHEN V. MONSMA
STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE
HARRY H. WHITELEY



S.E. Michigan Field Office 15500 Sheldon Road Northville, MI 48167

JAMES J. BLANCHARD, Governor

#### DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

November 14, 1985

Mr. Michael Tepatti Gold Shield Solvents Division of Detrex Chemicals 12886 Eaton Avenue Detroit, Michigan 48227

Re: MID 091605972

Dear Mr. Tepatti:

On November 6, 1985, acting as a representative of the United States Environmental Protection Agency, I performed an inspection of your facility located at 12886 Eaton Avenue, Detroit, Michigan. The purpose of this inspection was to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

As a result of that inspection, it has been determined that the above facility is in violation of some of the requirements of subtitle (c) of RCRA. Specifically, the following was found:

(1) CFR 40 265.14 (c) requires a disposal facility to post a sign stating "Danger - Unauthorized Personnel Keep Out" at each entrance.

The facility had such a sign on the door leaving the office area. However, partly because of recent garage door replacements, five access doors did not have the above sign or marking.

(2) 40 CFR 265.16 (c) requires personnel training to include annual reviews.

Your personnel had not received training since February, 1984.

On November 6, 1985, your facility was also inspected as a generator and transporter facility. Although not a deficiency, one vehicle used for waste transportation, appeared in questionable condition. The 1958 Kingham Stake Truck (License plate 80389D) was very corroded. It is my recommendation that it be inspected and approved as road worthy by the Motor Carrier Safety Division of the Michigan State Police. Proof of such an inspection will be required before relicensure next year.

You are requested to respond to this letter by November 20, 1985, providing documentation to this office regarding those actions taken to correct these violations. If you have any questions regarding this matter, please feel

- 2 -

free to contact me at (313) 459-9180. Your operating records were very good and your cooperation was appreciated.

Sincerely,

Margaret A. Field's HAZARDOUS WASTE DIVISION

MAF:mlm enclosure

# Allan Jool & Machine Co., Inc.

# PRECISION SCREW MACHINE PRODUCTS

1822 EAST MAPLE
TROY, MICHIGAN 48084
585-2910

November 7, 1985

United States Environmental Protection Agency Region 5 230 South Dearborn St. Chicago, Illinois 60604

Gentlemen:

In response to your request for information to § 3007 of Conservation and Recovery Act, 42 U.S.C. § 6927.

1. We are not a land fill or disposal site. We use trichlorethylene in our degreasing operation only. The liquid and solid waste generated by our degreasing equipment is picked up and disposed of by Gold Shield Solvents, E.P.A. #MID091605972. Once the waste material is removed from our still, it is placed in steel drums. The waste material is never in our building or on our property for more than 3 days. Thank you for your attention.

Sincerely,

ALLAN TOOL & MACHINE CO.

Jeffrey M. Scott Vice-President

JMS/LL

INTERPORT WASTE WASTE WASTE WASTE WASTE WASTE WASTE WITH THE SOLUTION OF THE S

### .RCRA INSPECTION REPORT

EPA Identification Number: MI	D09160	5912
Installation Name: <u>SOLD</u> .	SHIELD SONENTS	DIN DETREX CHE
Location Address: 1288	86 EATON DRA	JE
City: DETROIT	State: Mi	48227
Date of Inspection	Time of Inspection (fr	om) <u>9AM</u> (to) <u>IPM</u>
Person(s) Interviewed	Title	Telephone
MIKE TEPATTI	Mi REG. MNGR	(313) 391-3428
Transatau(s)	•	~ ·
Inspector(s)	Agency/Title	Telephone
Inspector(s)  MARGARET FIELD'S	Agency/Title  HWD/WQS	Telephone (3/3)459-9/80
Inspector(s)  MARGARET FIELD'S  Installation Activity (mark only one	HWD/WQS	
MARGARET FIELD'S	HWD/WQ5	(313)459-9180
Installation Activity (mark only one  Treatment/Storage/Disposal per 4	#WD/WQ5 box) 0 CFR §265.1 and/or	(3/3)459-9/80 Inspection Form(s) -
Installation Activity (mark only one  Treatment/Storage/Disposal per 4 Generation and/or Transportation	#WD/WQ5 box) 0 CFR §265.1 and/or	(3/3)459-9/80 Inspection Form(s) -
Installation Activity (mark only one  Treatment/Storage/Disposal per 4 Generation and/or Transportation  Treatment/Storage/Disposal (No Generation)	#WD/WQ5 box) 0 CFR §265.1 and/or	(3/3)459-9/80  Inspection Form(:) -  A

# DETREX

#### INSPECTION FORM A

### Section A: SCOPE OF INSPECTION.

- 1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
- 2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit applica	tion	process(es) (EPA Form 3510-3)	Inspect	on Form A	section(s)
S01 ]	X	storage in containers			I
\$02	X	storage in tanks			J
то1 _Т		treatment in tanks			J
S04 ]		storage in surface impoundment			K,F
Т02 ]		treatment in surface impoundment			K,F
D83 ]		disposal in surface impoundment			K,F
Z03 <u> </u>	口	storage in waste pile			L
D81 <u>]</u>		disposal by land application			M,F
D80 ]		disposal in landfill			N,F
. тоз []	$\Box$	treatment by incineration			0/P
Т04	X	treatment in devices other than t impoundments, or incinerators	anks, su	ırface	Q
Other activities					
GENERATOR	$\checkmark$		AF	PENDIX	GN
TRANSPORTER	X X		AF	PENDIX	TR

 Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion,

for less than 90 days and therefore can be segulated as Generation waste under 262.34 regulated as Seneration waste under 262.34 Fed DISTILLATION - Need to review fon 4 1985 Fed in the less incer exemption under reclaims

### Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B) YES NO NI\* Remarks Has the Regional Administrator been notified regarding: 265.12 Receipt of hazardous waste from a foreign source? Facility expansion? Change of owner or operator? General Waste Analysis: 265.13 Has the owner or operator obtained a detailed chemical and physical analysis of the waste? Does the owner or operator have a detailed waste analysis plan on file at the facility? Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? Security - Do security measures include: (if applicable) 265.14 24-Hour surveillance? i. Artificial or natural barrier around facility? ii. Controlled entry? c. Danger sign(s) at entrance? Owner or operator inspections: 265.15 Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and dischanges of hazardous waste that may affect human health or

the environment?

	hav	es the owner or operator ve an inspection schedule the facility?	<u> </u>	· .
	the	so, does the schedule address e inspection of the following ems:		1 - equipmon waste
	i.	monitoring equipment?	<u> </u>	1 equiprooteste
	ii.	safety and emergency equipment?	<u> </u>	- Los for wa
	iii.	security devices?	<u> </u>	
	iv.	operating and structural equip- ment (i.e. dikes, pumps, etc.)?	<u> </u>	
	٧.	type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	<u> </u>	
	vi.	inspection frequency (based upon the possible deterioration rate of the equipment)?	<u>k</u>	
		e areas subject to spills inspect- daily when in use?	<u> </u>	
	an	es the owner or operator maintain inspection log or summary of ner or operator inspections?	<u>k</u>	
		es the inspection log contain the llowing information:		
	i.	the date and time of the inspect	ion? <u>A</u>	
	ii.	the name of the inspector?	<u> </u>	
	iii.	a notation of the observations made?	<u> </u>	No notalions made
	iv.	the date and nature of any repairs or remedial actions?		NA I
5.	· .	training records 265.16		
	a. Jol	b titles?	<u>K</u>	
-	b. Joh	descriptions?	<u> </u>	

YES NO NI

Remarks

		,	153	NO	MI	Reliarks ///
	c.	Description of training?	X			Jacility of Market
	d•	Records of training?	K			Improved things
	e.	Did facility personnel receive the required training by 5-19-81?	盘	~~~	A	- plan
	f.	Do new personnel receive required training within six months?	R			
	g <b>.</b>	Do personnel training records indicate that personnel have taken part in an annual review of initital training?		_ <u>X</u>		aversight Semants trained to solved to
•	req	required, are the following special uirements for ignitable, reactive, incompatible wastes addressed? 265.1	7			1/A No read flamping
	a.	Special handling?			_ /	A No read free free free free free free free fre
	b.	No smoking signs?				
	c.	Separation and protection from ignition sources?				

## Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1.	Maintenance and Operation			
	of Facility: 265.31	YES NO	NI	Remark s
	Is there any evidence of fire, explosion, or release of			•
	hazardous waste or hazardous waste constituent?	$\alpha$		
_				
2.	If required, does the facility have the following equipment: 265.32	1.		
	a. Internal communications or alarm systems?	<u>K</u> _		
	b. Telephone or 2-way radios at the scene of operations?	X _		
	c. Portable fire extinguishers,			SCBA Presplfire eft glover flasser etr
	fire control, spill control equipment and decontamination	4.2		SCOMP Surger eth
	equipment?	X _		gloves grante
	Indicate the volume of water and/or f	oam availabl		<u> </u>
	_ AH forwastes - No	on flan	,	Does hardle a
	Man product in proce	ss - 1	Muri	upal writer supply
3.	Testing and Maintenance of Emergency Equipment: 265.33	iss - 1	Muni	ugal writer supply
3.	Testing and Maintenance of Emergency Equipment: 265.33  a. Has the owner or operator	iss - /	Muri	upal writer supply
3.	Testing and Maintenance of Emergency Equipment: 265.33	rss - 1	Muxi	upal writer supply
3.	Testing and Maintenance of Emergency Equipment: 265.33  a. Has the owner or operator established testing and	<u> </u>	<u>Muni</u> —	upal writer supply
3.	Testing and Maintenance of Emergency Equipment: 265.33  a. Has the owner or operator established testing and maintenance procedures for emergency equipment?  b. Is emergency equipment	<u> </u>	Muxi —	ugal witersupply
3.	Testing and Maintenance of Emergency Equipment: 265.33  a. Has the owner or operator established testing and maintenance procedures for emergency equipment?	<u> </u>	<u> </u>	ugal water supply
	Testing and Maintenance of Emergency Equipment: 265.33  a. Has the owner or operator established testing and maintenance procedures for emergency equipment?  b. Is emergency equipment maintained in operable condition?  Has owner or operator provided	<u> </u>	<u></u>	eight with supply
	Testing and Maintenance of Emergency Equipment: 265.33  a. Has the owner or operator established testing and maintenance procedures for emergency equipment?  b. Is emergency equipment maintained in operable condition?	<u>X</u>	<u></u>	intercon
4.	Testing and Maintenance of Emergency Equipment: 265.33  a. Has the owner or operator established testing and maintenance procedures for emergency equipment?  b. Is emergency equipment maintained in operable condition?  Has owner or operator provided immediate access to internal alarms? (if needed) 265.34  Is there adequate aisle space	<u>X</u>	<u></u>	intercon
4.	Testing and Maintenance of Emergency Equipment: 265.33  a. Has the owner or operator established testing and maintenance procedures for emergency equipment?  b. Is emergency equipment maintained in operable condition?  Has owner or operator provided immediate access to internal alarms? (if needed) 265.34  Is there adequate aisle space for unobstructed movement?	<u>X</u>	<u></u>	intercon
4.	Testing and Maintenance of Emergency Equipment: 265.33  a. Has the owner or operator established testing and maintenance procedures for emergency equipment?  b. Is emergency equipment maintained in operable condition?  Has owner or operator provided immediate access to internal alarms? (if needed) 265.34  Is there adequate aisle space for unobstructed movement?  Has the owner or operator attempted to make arrangements with local	<u>X</u>	<u></u>	intercon
4.	Testing and Maintenance of Emergency Equipment: 265.33  a. Has the owner or operator established testing and maintenance procedures for emergency equipment?  b. Is emergency equipment maintained in operable condition?  Has owner or operator provided immediate access to internal alarms? (if needed) 265.34  Is there adequate aisle space for unobstructed movement?  Has the owner or operator attempted	X _ X _ X _ X _ X _		intercon

### Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

YES NO NI Remarks

1.	Does	the	Contingen	cy Plan	contain	the
	foll	owing	informat	ion:	265.52	

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

α\_\_\_\_

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

A

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

Not nicessary-smoldg. Only Joors availare ent doors to explate

2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

YES NO NI Remarks Emergency Coordinator Is the facility Emergency Coordinator identified? Is coordinator familiar with all aspects of site operation and emergency procedures? Does the Emergency Coordinator have the authority to carry out the Contingency Plan? Emergency Procedures 265.56 If an emergency situation has occurred NA-Noenerghave south at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

		-	Section E: MANIFEST SYSTEM, REC	URDKEE	PING,	AND RE	PORTING: (Part 265 Subpart E)
		•	,	YES	NO	NI	Remarks
٠1.	Use	of	Manifest System 265.71				
	a.	pro pro (Pai the gene	s the facility follow the cedures listed in §265.71 for cessing each manifest? rticularly sending a copy of signed manifest back to the erator within 30 days after ivery.)	K			-
	b.		records of past shipments ained for 3 years?	A			
2.	req	uire	e owner or operator meet ments regarding manifest ancies? 265.72				None observed
of	on-s	ite	ble to owners or operators facilities that do not waste from off-site sources.				·
3.	0pe	rati	ng Record 265.73				
	a.	mai rec	s the owner or operator ntain an operating ord as required in .73?	1			-
	b.	con	s the operating record tain the following ormation:				
		i.	The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?	K			
		ii.	The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by by a manifest.)	K			
	***1	ii.	A map or diagram of each cell or disposal area				
5							•

E-1

4/82-A

\*\*\* only applies to disposal facilities

•		YES	NO	NI	Remarks .
	showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)			_M	ν <u>.</u>
iv.	Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	K.			
٧.	Reports detailing all incidents that required implementation of the Contingency Plan?			NA	- No violento
٧i،	All closure and post closure costs as applicable?	K			
Availa	ability of Records 265.74	`			
under	ll facility records requi <b>red</b> 40 CFR Part 265 available for ction?	A			
'Unman	ifested Waste Reports 265.76				
hā	as the facility accepted any azardous waste from an off-site				•

- a. Has t haza generator subject to 40 CFR 262.20 without a manifest or or shipping paper?
- b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

<sup>5.\*\*</sup>Unmanife

Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

# Section G LOSURE AND POST CLOSURE (Part Subpart G)

	•					YES	NO	NI	Remarks
1.	C1 o	sure	265	.112					
	a.			acility closur ilable for ins		<u>X</u>			
	ь.	Does	s the	plan identify	<b>:</b> ·				
		i.		num extent unc facility life?				NA-	- Entire facility
		ii.	maxi vent	mum hazardous ory?	waste in-	K		•	
		iv.	esti	mated year of	closure?	K			2009
•		٧.	sche	dule of closur	e activities?	K			
	c.	Has	clos	ure begun?			X		
*2.	Pos	t-Cl	osure	<b>265.</b> 118	•		/ a		
	a.			ost-closure plection?	an available	1	4		
	<b>b</b> .	Does	s this	s plan contain	:				•
3.5		i.	monit	ription of gro toring activit uencies?					
		ii.		ription of mai vities and fre					\
			AA.	integrity of cover, or con structures, w	tainment			<del></del>	
			BB.	-	toring equip-				
	i	ii.	of po	ment , address, and erson or offic ng post-closur					
	c.	Has	the p	post-closure p	eriod begun?				
	d.			ritten post-cl available?	osure cost 265.144				
Арр	lies	only	y to (	disposal facil	ities.	G-	.1		4/82-A

### Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

		YES	NO	NI	Remarks
۱.	Are containers in good condition? 265.171	K		************	***************************************
2.	Are containers compatible with waste in them? 265.172	K			
3.	Are containers managed to prevent leaks? 265.173	4			
4.	Are containers stored closed?	1			
5.	Are containers inspected weekly for leaks and defects.	A			
6.	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).	265.776		<u>M</u> A	neither wastes
7.	Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177			NA	processia sie
8.	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?			NA	

# Section J - TANKS (Part 265, Subpart J)

YES NO NI Remarks

1.	Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192
2.	Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures?  MA - Covered
3.	Do continuous feed systems have a waste-feed cutoff?  WA - No continuous feed
4.	Are waste analyses done before the tanks are used to store a substantially different waste than before?  265.193  MA-Not Changeo.
5.	·
6.	Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? 265.198  Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)  All Millier products
7.	Are incompatible wastes stored in separate tanks? 265.199 (If not, the provisions of 40 CFR 265.17(b) apply.)
8.	Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?
	Tank capacity:gallons A/A No flan freac
	Tank diameter:feet
	Distance of tank from property line feet
	(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids

#### Appendix GN

	Se	cti	on	Α:	Scope
--	----	-----	----	----	-------

 Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Sect	ion l	B: MANIFEST REQUIREMENTS (Part 262, Subpar	t B)			
		·	YES	NO	NI	Remarks
(1)		s the operator have copies of the manifest ilable for review? 262.40	X			
(2)	mon	mine manifests for shipments in past 6 ths. Indicate approximate number of ifested shipments during that period.	12			
(3)	fol cop	the manifest forms examined contain the lowing information: (If possible, make ies of, or record information from, manities) that do not contain the critical ments). 262.21				
	a.	Manifest document number?	K			
	b.	Name, mailing address, telephone number, and EPA ID number of Generator	<u>A</u>			
	с.	Name and EPA ID Number of Transporter(s)?	K			
	d.	Name, address, and EPA ID Number Designated permitted facility and alternate facility?	K			
	e.	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	4			· · · · · · · · · · · · · · · · · · ·
	f.	The total quantity of waste(s) and the type and number of containers loaded?	K			
	g.	Required certification?	X			
	h.	Required signatures?	K		<del></del>	
(4)	Repo	ortable exceptions 262.42	•			

b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator.

For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has  $\underbrace{\text{NOT}}$  received a

signed copy from the designated facility within 35 days of the date of shipment.

# Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

_			1F2	NU	NI	Remark s	3	
1.	wit	waste packaged in accordance h DOT regulations?					00	
		quired prior to movement of ardous waste off-site) 262.30			_11	4-13	ulk_	
2.	in con (Re	waste packages marked and labeled accordance with DOT regulations cerning hazardous waste materials? quired for movement of hazardous te off-site) 262.31 262.32			<u> M</u>	1 - B	ulk	
3.		required, are placards available to nsporters of hazardous waste? 262.33	K					<del></del> -
. 4.	was wit and	site accumulation of generated hazardous was te it generates either (A) in its storage fa h 40 CFR 262.34 [see 265.1(c)(7)]. Option B containers. If the installation elects opt Section D. If the installation elects options: See 40 CFR 262.34 January 11, 1982 Rev	cility restrition A, on B, co	[265] cts a check	l(b)] ll ac this e the	or (B) cumulation box TT following	in accordance on to tanks and skip og obsærva-	
	a.	Is each container clearly marked with the start of accumulation date?		Opta 	on k	3- To		
	b.	Have more than 90 days elapsed since the date inspected in (a)?		<del></del>	1.	A		·
	с.	Do wastes remain in accumulation tanks for more than 90 days?		X	<del></del>	<del></del>		
	d.	Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	K					<del></del>
Sec	tion	D: - RECORDKEEPING AND REPORTING (Part 262,	Subpar	rt D)				
1.	nee min	all test results and analyses add for hazardous waste deter- actions retained for at least see years? 262.40	YES Jisi ang deta	NO ted Lysi	NI Wai	Rema Le Hill cof Mi	sefore Lessary Labodo	for
Sec	tion	E: - INTERNATIONAL SHIPMENTS (Part 262, Sub	part E	)				
1.		the installation imported or orted Hazardous Waste? 262.50		X		-		<del></del>
		answered Yes, complete the following applicable.)						
	a.	Exporting Hazardous waste; has a generator:						

•		•	123	NO	IAT	Reliark S	
i		ified the Administrator in ting?					
	ii.	Obtained the signature of the foreign consignee confiming delivery of the waste(s) in the foreign country?					·
	iii.	Met the Manifest requirements?					
b.	the g	ting Hazardous Waste; has enerator met the manifest rements?		K		Not imposting	

# Appendix TR

Sec	tion A: SCOPE:	YES	NO	NI	Remarks
1.	Complete this Appendix if the owner or operator transports hazardous waste subject to 40 CFR 263.10.			<del></del>	
2.	Does the transporter transport hazardous waste into the U.S. from abroad?		K		
3.	Does the transporter transport hazardous waste out from the U.S.?		A		
4.	Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?		K		
Sec	tion B: MANIFEST SYSTEM AND RECORDKEEPING	(Part	263	, Subp	art B)
1.	Are copies of <u>completed</u> manifests available for review and retained for three years. 263.22	K			
2.	Estimate the number of manifests for shipments completed during the part 6 months.	<u> </u>	20	0	
3.	Examine a representative number of manifests. Indicate number examined.	<u>u</u>	-6	0	
4.	Did transporter properly sign and date the manifests examined?	K		•••••	
5.	Do any manifests indicate shipments delivered to other than the designated facility? 263.21	<del></del>	K	· —	
	If (5) is "no," skip 6 and 7.				
6.	Do any manifests indicate shipments delivered to other than an alternate facility?	_	<u>_</u>	_	
7.	Are shipments delivered to alternate facilities only because emergency prevents delivery to the designated facility?				

### Act 64 Hazardous Waste Transporter Inspection Form

EPA Identification Number:	209160	15922
Installation Name: GOLD SHIELD		
Location Address: 12886 EA	TON ALE	
Mailing Address: SAME		
City: DETROIT	State: M/	Zip: 18227
Check One: Compliance Inspection Licensing Inspection: New	Renewal X	-
Date of Inspection // 5 Time of	Inspection (from)	PAM (to) IFM
Persons Interviewed (if any):	Title;	THE KOKH TSD Telephone:
MIKE TEPATU	M. REG. MNGR	(3/3)39/-3428
Inspector(s):	Agency/Title:	Telephone:
MARGARET FIELD'S	HWD/WOS	(313) 959-980

### YES NO N/A\* REMARKS

A.	Scope of Operations				
1.	Does the transporter transport hazardous waste into the U.S. from abroad?	<del></del>	K		
2.	If yes to 1., does the manifest contain the information required by 40 CFR 262.50(d)?			X	
3.	Does the transporter transport hazardous waste out of the U.S.?	# #	X		<del></del>
4.	If yes to 3., is there evidence from the state or foreign government that the disposal facility is approved for the type of waste being shipped? (R 806(b))	<u> </u>		K	
5.	If yes to 3., has the trans- porter complied with the requirements of 40 CFR 262.50(b)&(c)?		<del></del>	X	
6.	Is there evidence of trans- porting of hazardous wastes for which the transporter is not licensed? (If yes, explain.)			K	
7.	Is the transporter licensed to conduct transfer operations at the facility? (Transfer operations include off-loading and on-site accumulation of wastes before reloading and further transport.)				-75D
8.	Is there evidence that hazardous wastes have been mixed, combined or commingled without written DNR approval? (R 808)		<u>A</u>		will be expanding into me of after,
* N/	A should be followed by remark.				approval + regintantes

### YES NO N/A\* REMARKS

В.	Manifest System and Recordkeeping
1.	Are copies of completed mani- fests available for review and retained for three years? (40 CFR 263.22, R 807(1)(d))
2.	Estimate the number of mani- fests for shipments completed during the past six months.
3.	Examine some of the manifests and indicate the number examined.
4.	Do the hazardous waste mani- fests examined contain the following information? (R 806 and R 807)
	a. The generator name, mail- K ing address, telephone number and EPA identification number?
	b. The name, mailing address, telephone number and EPA identification number of each hauler?
	c. The name, address, tele- phone number and EPA identi- fication number of the disposal facility to which the waste was delivered?
	d. A description of the waste(s) as required by U.S. Department of Trans- portation regulations? (49 CFR 172.202)
	e. The total quantity of each waste and the type and number of containers loaded onto or into the transport vehicle?

<sup>\*</sup> N/A should be followed by remark.

			YES	NO	<u>N/A</u> *	REMARKS Daving If
	f.	The hazardous waste number described in R 206 which best describes the waste?	r <u>K</u>			Escept for Wolf
	g.	Certification signatures of generator and shipping date?	X			
	h.	Certification signatures of each hauler, vehicle identification numbers an dates wastes were receive				own fasility flut
	i.	Certification signature of TSD facility represent tive and dates wastes were received?				TSD had app paper
5.	ous the 15 for	there evidence that hazard waste was not delivered to designated facility within days of transporter accept transport? (R 807(I)(c)) yes, explain.)	o —— n	X		
6.	del mad the	there evidence that ivery of hazardous waste w e to a facility other than one designated on the ifest? (If yes, explain.)		K		
7.	wit if was	the transporter complied h the requirements of R 80 a rejected waste shipment handled? (If no, lain.)	9 —			None observed

### C. Vehicles and Facility Integrity

1. Identify the vehicles inspected at the facility during this inspection and provide the following information:

<sup>\*</sup> N/A should be followed by remark.

171 - 171-4	3 /	Vehicle and ID No. License De 1958 KINGHAM 1600/	204.	5		No No		No K	red? 80389) AT693
	2.	Are all vehicles marked as	YES	NO	<u>N/A</u> *	REMARKS	<del></del>		
	_,	required by R 803(4)(a)?				a.? .	1		- .207
		Are all areas where vehicles are stored, cleaned, repaired or otherwise maintained (other than areas where only mechanical maintenance occurs), constructed or maintained such that no hazardous waste or hazardous waste components can escape to the air, soil, surface or groundwaters, drain or sewers? (R 804)  Is there evidence of spillage of hazardous waste in vehicle storage, repair or maintenance areas?			- Ha	All tru endle s expert	nly de	resente far es conta	pillage naria
	If th	he answer to question A.7. (tra	nsfer	oper	ations	) is yes,	comple	te	
	the :	following questions:	Q.33			1			
	5.	Is all hazardous waste retained at the site during transfer operations stored in containers or tanks?	1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2			HS	15	1	<del>-</del>
en u	6.	Are all such containers and/or tanks located within a containment structure?	- 1		•	4			

\* N/A should be followed by remark.

N/A\* REMARKS YES NO 7. Does the containment structure provide at least 150 percent containment? 8. Is the integrity of the containment structure adequate to prevent any loss of hazardous waste to soils, drains, sewers, or surface or groundwater? 9. Are all containers in good condition? 10. Are all containers labeled as required by Rule 905(1)(a)&(b)? 11. Is all hazardous waste placed in containment in a manner which prevents the possible mixing of incompatible wastes?

<sup>\*</sup> N/A should be followed by remark.

STATE OF MICHIGAN

NATURAL RESOURCES COMMISSION

JACOB A. HOEFER ROBERT HOLMES E. M. LAITALA HILARY F. SNELL PAUL H. WENDLER HARRY H. WHITELEY 24 26 R ED JAMES J. BLANCHARD, Governor

Hazardous Waste Division 9311 Groh Road Grosse Ile, Michigan 48138

#### DEPARTMENT OF NATURAL RESOURCES

March 1, 1984

Mr. Michael J. Tepatti Branch Manager Gold Shield Solvents Division of Detrex Chemical Industries, Inc. 12886 Eaton Avenue Detroit, Michigan 48227

Re: MID 091605972

Dear Mr. Tepatti:

Thank you for your February 3 letter. Information contained in the letter and observations made during a January 13 meeting indicates that the company has corrected the deficiencies found during the December 12, 1983 RCRA compliance inspection.

The facility should now be in compliance with the interim status standards. Your reply along with my comments will be forwarded to U.S.E.P.A. Region V for their review.

Again, thank you for your cooperation. Please contact me if you have any questions.

Sincerely,

William E. Stone

Water Quality Specialist Compliance Section Hazardous Waste Division

William E. S Tre

(313) 675-0860

WES/sc

cc: Ken Burda (3)



# GOLD SHIELD SOLVENTS

Division of Detrex Chemical Industries, Inc.

12886 EATON AVE., DETROIT, MICHIGAN 48227

AREA CODE 313 TELEPHONE 491-4550

February 3, 1984

Mr. William E. Stone
Water Quality Specialist
Department of Natural Resources
Hazardous Waste Division
Compliance Section
9311 Groh Road
Grosse Isle, Michigan 48138

RECEIVED

FEB 0 9 1984

WATER QUALITY DIV.

RE: MID 0 9 1 6 0 5 9 7 2 RCRA Inspection

Dear Mr. Stone:

On December 12, 1983 a RCRA Inspection was conducted and several deficiencies found. On January 13, 1984 a follow up inspection was conducted to note progress made in correcting these deficiencies, the following action has been taken in correcting the interim status standards deficiencies.

- \*A new waste analysis plan has been written and includes parameters for which samples of shipments of offsite waste are being analyzed.
- \* The inspection schedules/logs are being kept according to 40 CFR 265.15 along with the inspectors name, date, and time.
- \* The training program and form for recording training will meet RCRA requirements, and the training itself has been conducted.
- \* The floor sweepings have been placed in 55 gallon steel drums, and all drums have been sealed.
- \* The contingency plan has been amended to include that the coordinator will notify the National Response Center if an emergency threatens human health or the environment. The plan has been submitted to local emergency agencies and we have signed receipts supporting this.
- \* The closure plan now includes a statement that the plan will be submitted to the Regional Administrator at least 180 days prior to the start of clusure.

CC: Ken Burda (3)



# GOLD SHIELD SOLVENTS

Division of Detrex Chemical Industries, Inc.

12886 EATON AVE., DETROIT, MICHIGAN 48227

AREA CODE 313 TELEPHONE 491-4550

- \* Containers holding on-site generated waste are now all closed. The waste has been analyzed and is scheduled for disposal at Chem-Met services.
- \* The tank holding hazardous waste has been accordingly marked.
- \* We have reduced our waste inventory since the inspection. However, we also have contacted the U.S.E.P.A. with a revised "Part A" application indicating that a greater design capacity exists.
- \* The operating record has been upgraded according to the format in 40 CFR 265 appendix I.

I believe I have covered everything noted in both inspections. If you have any questions, or require any additional information, please contact me at your convience.

Very truly yours,

Michael J. Tepatti, Branch Manager

Gold Shield Solvent.

MJT/bh

cc: B. A. Roberts

W. Robrecht

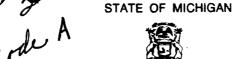
R. Swan

File.

125 17-84 produ A

NATURAL RESOURCES COMMISSION

JACOB A HOFFER ROBERT HOLMES E. M. LAITALA HILARY F. SNELL PAUL H. WENDLER HARRY H. WHITELEY



JAMES J. BLANCHARD, Governor

#### DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING BOX 30028 LANSING, MI 48909 XNSSKE SHEWKE XXBEKKONX Ronald Skoog, Director Hazardous Waste Division

9311 Groh Road Grosse Ile, Michigan 48138

January 19, 1984

Mr. Michael J. Tepatti Branch Manager Gold Shield Solvents Division of Detrex Chemical Ind., Inc. 12886 Eaton Avenue Detroit, Michigan 48227

> Re: MID 091605972 RCRA Inspection

Dear Mr. Tepatti:

On January 13, 1984, a RCRA follow-up inspection was conducted at your facility. Your progress in correcting the interim status standards deficiencies found on December 12 was assessed.

The new waste analysis plan will meet the 40 CFR 265.13 requirements with one modification. The parameters for which samples of shipments of offsite waste will be analyzed must be indicated.

The inspection schedules/logs are fine but remember to record the time on the daily log and the date and the name of the inspector on the weekly log. Daily inspections are again being recorded.

The training program as described and the form for recording training meet the RCRA requirements. The actual training has not been conducted, however.

The floor sweepings have been placed in sealed 55-gal. steel drums.

The contingency plan is good but still needs a statement that the coordinator will immediately notify the National Response Center and local agencies if an emergency threatens human health or the environment outside the facility. This statement could be added as paragraph c) or as a footnote on page 2 under Implementation. You are submitting the plan to emergency agencies and getting signed receipts.

Mr. Michael J. Tepatti January 19, 1984 Page 2

The closure plan is now only lacking a statement that the plan will be submitted to the Regional Administrator at least 180 days prior to the start of closure.

Containers holding on-site generated waste are now all closed. The waste has been analyzed and is scheduled for disposal at Chem Met Services.

The tank holding hazardous waste still needs to be marked with "Hazardous Waste".

You indicate that you personally are operating the still and are reducing waste inventory. You stated also that a revised "Part A" is being sent to the U.S.E.P.A. indicating that a greater design capacity existed at the time of application than the 8,000 gal. of SOl recorded on the application.

Also, you are working on upgrading the operating record to match the format in 40 CFR 265 Appendix I, a deficiency I neglected to mention in my January 13 letter.

Since I have reviewed all the plans, logs, etc., your February 6 reply can just describe actions taken to comply with the interim status standards.

Thank you for your cooperation. Feel free to contact me if you have questions.

Sincerely,

William E. Stone

Water Quality Specialist Compliance Section Hazardous Waste Division

William E. Stre

(313) 675-0860

WES/sc

cc: Ken Burda (3)

NATURAL RESOURCES COMMISSION

JACOB A. HOEFER ROBERT HOLMES

PAUL H. WENDLER HARRY H. WHITELEY

E. M. LAITALA HILARY F. SNELL STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

#### DEPARTMENT OF NATURAL RESOURCES

January 13, 1984

Mr. Michael J. Tepatti Branch Manager Detrex Chemical Industrial, Inc. Gold Shield Solvent Division 12886 Eaton Avenue Detroit, Michigan 48227

Re: MID 091605972

Dear Mr. Tepatti:

On December 12, 1983, your facility was inspected to determine compliance with Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976, as amended. The company stores, transports and generates hazardous waste and is subject to the Act.

The following deficiencies were found during the inspection:

- The waste analysis plan must be improved.
  - (a) For new waste streams, the plan must identify who supplies data on the waste, the generator or Detrex. The parameters for which you require the waste to be analyzed must be listed and your rationale for choosing those parameters must be explained. The analytical method you require to be used must be identified for each parameter. The criteria you use for determining when the analysis is updated or repeated should be explained.
  - (b) For each shipment from off-site, the plan must describe your inspection technique for identifying manifest discrepencies. Criteria used to determine when the shipment will be sampled must be identified. The sampling techniques must be described. Constituents for which analysis will be done, the rationale for choosing those constituents, and the analytical methods must be listed.

Mr. Michael J. Tepatti January 13, 1984 Page 2

- (c) Review 40 CFR 265.13 for general waste analysis requirements.
- 2. The written inspection schedule and log were deficient in a number of areas.
  - (a) The schedule, basically, must identify everything the inspector looks at, describe everything (problem) he looks for and the frequency of inspection for each item. The inspection schedule must include inspections for but should not be limited to malfunctions, deterioration, operator errors, discharges and of monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment. Areas subject to spills such as your container and tank storage facilities and processing area must be inspected daily.
  - (b) The inspection log has no entries since May 1983. There should be daily entries.
  - (c) The format of your log should be improved. The preferred form is a check list with a row for every item and problem identified in the written schedule and space for the date, time, name of inspector, observations and date and nature of remedial action.
  - (d) The general inspection requirements are found in 40 CFR 265.15
- 3. No personnel training records were available. The training program and records must conform to the stipulations of 40 CFR 265.16.
- 4. The facility was not being maintained to minimize the release of hazardous waste (40 CFR 265.31). A pile of floor sweepings and absorbant soaked with solvent was observed in the hazardous waste management facility behind a stack of drums. This material should be picked up regularly and placed in containers.
- 5. There was no documentation that the arrangements with local authorities and response teams required by 40 CFR 265.37 have been made. If no arrangements are necessary or possible, those facts must be recorded in the operating record.
- 6. The contingency plan did not indicate that the emergency coordinator will immediately notify the National Response Center (1-800-424-8802) in the event of an emergency and provide a written report to the Regional Administrator within 15 days after the incident [40 CFR 265.56(d)(2) and (j)]. The plan should indicate what facts the coordinator will provide in the notifications. It should also be stated that notification will be provided to the State (1-800-292-4706).

- 7. There is no documentation in the contingency plan that copies of the plan have been submitted to local emergency agencies and response teams [40 CFR 265.53(b)]. A certified letter receipt would be sufficient.
- The closure plan must be revised to meet the requirements of 40 CFR 265 Subpart G.
  - (a) An estimate of the expected year of closure must be presented.
  - (b) A description of the steps needed to dispose of the waste inventory and decontaminate the equipment during closure must be included.
  - (c) A schedule giving the total time required to close and the time required for intervening steps must be developed.
  - (d) Wording indicating that the plan will be submitted to the Regional Administrator at least 180 days prior to the start of closure must be included.
  - (e) The closure cost estimate must be adjusted or outlined in 40 CFR 265.142.
- 9. Not all of the containers holding on-site generated waste were stored closed [40 CFR 265.173(a)].
- 10. You indicated that still-bottoms generated on-site have never been accumulated beyond 90 days and that you wish to manage these as a generator and separate from the hazardous waste management facility. The tank used for accumulation of the bottoms must therefore be marked with the words "Hazardous Waste" as stipulattd in 40 CFR 262.34(a)(3).
- The "Part A" of your hazardous waste permit application lists a process design capacity of 8,000 gallons for storage of containers (501). My calculations suggest that storage at the time of inspection exceeded 9,000 gallons. The inventory must be immediately reduced to design level.

Please submit revised plans, schedules etc. and information to bring you into compliance with the interim status standards by February 6, 1984.

Thank you for your cooperation. Feel free to contact me if you have any questions.

Sincerely.

William E. Stone

Water Quality Specialist Compliance Section

William E. Stone

Hazardous Waste Division

(313) 675-0860

WES/sc

cc: Ken Burda (3)

# RCRA ISS INSPECTION PERFORMANCE EVALUATION

I.	Name of Facility: DETREX CHEMICAL INDUSTRIES EPA ID# MID 09   605 972
	Street: 12886 EATON AVE
	City: DETROIT State: MICHIGAN Zip: 48227
	Type of Facility (on/off site TSD): ONSITE TSD, SOWENT RECOMMER
II.	Name of Inspector: BILL STONE
	Urganization: MONIZ
	lelephone: (313) 675 - 0860
III.	Name of Evaluator: MICHAEL MUTNAN
	Urganization: U.S. EPA WMB
	Telephone: 886-3740
17.	Date of Facility Inspection Time: (from)/0:00 (to)/:00
٧.	ISS Inspection Evaluation
	A) Pre-inspection Preparation
	1) Did the inspector have a complete set of RCRA regulations with him?
	Yes X No Comment
	2) Did the inspector have the Part A application before beginning the inspection?
	Yes X No Comment
	3) Did the inspector have the appropriate personal safety equipment?
	Yes $X$ No Comment

4) Did the inspector verify that the local authorities have been contacted concerning their roles in this facility's contingency plan?

	Yes_X No_ Comment
B)	Conduct of Inspection
	1) Did the inspector identify himself and his authority to perform RCRA inspections?
	Yes X No Comment
	2) Describe the inspector's approach to the task of obtaining information.  NE WAS VERY PROFESSIONAL AND WAS FIRM BUT POLITE. HE DEVELOP A 6000  RAPPORT WITH THE FACILITY PER SONNEL AND THE INSPECTION WENT SMOOTHLY  BELAUSE OF THIS.
	3) Was the inspector helpful to the owner/operator with respect to understanding the regulations?
	Yes No X Comment NEEDS MORE TRAINING ON THE REGS MAY NOT BE UP TO DATE ON ALL REG CHANGES
C)	Document Inspection
	1) List documents reviewed by the inspector.
	Part A application Operator inspection log Operator inspection schedule Personnel training record Operating record Contingency plan Waste analysis plan Closure & Post Closure plan Manifests
	2) Discuss the inspector's review of the above-listed items.  THE INSPECTUR REVIEWED THE PLANS FROM HIS RECOLL OF THE REGS. HE SHOULD ALSO CONDUCT A MINI-REVIEW OF THE REGS AT THE SAME TIME TO PICK  UP ANY MISSING ITEMS.

U,	· uc	ittey inspection	<b>/</b> 11						
	1)			erve all required items and correctly record the , list any omissions.					
	2)			pertinent questions regarding the processes and ctices used at the facility?					
		Yes <u>X</u> No	)	Comment					
	3)	Did the inspectacility?	tor ask	questions about nonregulated activities of the					
		Yes <u>X</u> No	)	Comment					
E)			nspecto	ons r's knowledge of RCRA regulations applicable to to OATE-ON FULL CONTENT OF THE REGS					
	2)			re of recent amendments of the regulations that may this inspection?					
		Yes_X No	)	Comment					
	3)	Was the inspector able to answer regulatory questions accurately?							
		Yes_X No	)	Comment					
F)	Com	pletion of ISS	Inspect	ion Forms					
	1)	Did the inspec	tor ful	ly complete the inspection form?					
		Yes N	lo	Comment					

	2)	the report?
		Yes No Comment ·
	3)	Were the inspector's comments factual observations rather than opinion?
		Yes_X No_ Comment_
	4)	Does the inspector's report accurately reflect your observations at the facility?
		Yes No Comment_
G)	Rem	arks
	1)	Briefly state your overall assessment of the inspection and the inspection report.
		A FAIRLY GOOD JOB WAS PONE OVERALL. THE INSPECTOR WAS VERY PROPESSIONAL AND MANDLED ALL QUESTIONS
		WAS VERY PROFESSIONAL AND MANDLED ALL QUESTIONS
		WEU.
	2)	What, if anything, would you recommend that the inspector do differently?
		PREPARE SOMEWHAT BETTER BY REVIEWING THE REGS
		BEFORE WAND.

PLEASE FORWARD THIS EVALUATION FORM WITHIN 5 DAYS FROM THE DATE OF INSPECTION TO CHIEF, WASTE MANAGEMENT BRANCH, 5AHWM.

SAHMD | WMB | HKC 5/29/81

# RCRA Inspection Report

EPA Identification Number: $M I 2$		
Installation Name: <u>Gold Shi</u>	ield Solvents; Div. of	Detrex Chancal Ind., In
Location Address: 12886 Ea	fon Ave.	
City: <u>Defroit</u>	State: Mi. 4822	7 .
Date of inspection:	Time of inspection (from)	9:39 (to) 2:30p
Person(s) interviewed	Title	Tel ephone
Mike Tepatti	Branch Manager	313)391-3428
Inspector(s)	Agency/Title	Tel ephone
William E. Stone	MIDNR-HWD/WAS	3/3)675-0860
Installation Activity (mark only of	ne box)	Inspection Form(s)
Treatment/Storage/Disposal per Generation and/or Transportation		A
Treatment/Storage/Disposal (no	generation or Transportation)	A
$\prod$ Generation and Transportation		В, С
☐ Generation only		В
TT Transportation only		С

cc: Ken Burba (3) Company

#### RCRA Inspection Report

Detrex Chemical Industries, Inc. Gold Shield Solvents Division 12886 Eaton Avenue Detroit, Michigan 48227

#### MID 091605972

The inspection was audited by Mike Mutnam, U.S.E.P.A. Region V. Mr. Tepatti, branch manager and Mr. Swan, Engineering, represented Detrex.

The facility distributes in bulk and container freon, trichloroethylene, l,l,l-trichloroethane, tetrachloroethylene (perc) and methylene chloride to various industries. Virgin solvents come in bulk by rail or truck and are stored in outside, diked, aboveground tanks.

The company picks up containers of spent degreaser (F001) and solvent (F002) from its customers of virgin solvent and from other branch offices and stores them inside the plant in a contained area. The company has an Act 64 transporter business license and the vehicles used to pick up the spent solvent are licensed under Act 64 and Act 136. The spent solvent is periodically (batch) processed in an atmospheric still. The customer is credited for the amount of solvent recovered. The reclaimed material is sold as product.

The still bottoms (F002) are accumulated in an indoor tank that is within the HWMF containment. Chemical Recovery pumps out the tank monthly and transports the bottoms to their TSDF for further processing.

Material from on-site spill and leak clean-up and floor sweepings are placed in 55-gal steel drums and stored in the HWMF. Some of the 13 drums were not closed. This material has not been disposed of previously.

The still operator apparently has been off work for some time and the company has about 9,000 gals. of waste in containers in storage. The "Part A" covers only 8,000 gals. of 501.

Other problems are discussed in the deficiency letter to the company.

William E. Stone

WES

#### INSPECTION FORM A

### Section A: SCOPE OF INSPECTION.

TRANSPORTER 🔀

- Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
- Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit applicat	tion	process(es) (EPA Form 3510-3)	Inspect	ion Form A	section(s)
s01 <b>&gt;</b>	<b>T</b>	storage in containers			I
\$02	<u>ব</u>	storage in tanks			J
тоі 📘	I	treatment in tanks			J .
s04 <u>T</u>	I	storage in surface impoundment			K,F
T02 <u>T</u>	I	treatment in surface impoundment			K,F
D83 <u>T</u>	コ	disposal in surface impoundment			K,F
s03 <u>T</u>	I	storage in waste pile			L
D81 <u>T</u>	コ	disposal by land application			M,F
D80 I	I	disposal in landfill		•	N,F
тоз <u>Т</u>	I	treatment by incineration			0/P
T04 🐧	XI	treatment in devices other than to impoundments, or incinerators	anks,	surface	Q
ther activities					
GENERATOR D	ব		•	APPENDIX	GN

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

APPENDIX

TR

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per tended:

\*Ken Burla(3)

40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

502- The still bottoms are accumulated for 90 days or less and 262.34 is complied with. 265.1(c)(7)

TO4- The treatment is distillation (reclamation) 261.660.

}		<u> </u>	Section B:	GENERAL FACIL	ITY STA	NDARDS:	(Part	265 Subpart B)
					YES	NO	NI*	Remarks
1.			nal Adminis regarding:					
	٥.		f hazardous n a foreign	source?				NA
	b.	Facility (	expansion?					NA
	c.	Change of	owner or o	perator?				NA
2.	Gene	eral Waste	Analysis:	265.13				•
	a.	a detaile		rator obtaine and physical e?	d X			own waste and customers. GC scan.
	b.	a detaile	owner or op d waste ana t the facil		χ_			expand to describe
)	c.	specify p		or inspection movement of		X		1. Analysis req. of new waste.  attackmeter, rationale for Paramete  5. Test methods.  2. Inspection of each shipment  3. Whe f why sample  4. Sample method  5. Parameters - rationale
3.	Sec ,		security m plicable)	measures inclu 265.14	de:		-	6. Test Methods
3	. a .	24-Hour s	urveillance	?			·	locked
	b.	i. Artifi barrie	cial or nat r around fa		×			
		and ii. Contro	lled entry?		X			كالمالة والمرابع
	c.	Danger si entrance?			· X			
4.	0wn	er or oper	ator inspec	ctions: 265.1	5			
	a.	inspect t malfuncti operator of hazard	doùs waste d	/ for ioration, i dischanges that	·			
		the envi	t human hea ronment?	iiin or	×	1	no lo	g-not since May 83

YES NO NI Re	marks
--------------	-------

		have at t	e an inspec the facilit so, does th inspection	or operator tion schedule y? e schedule addre of the followir		×		 not specific must describe problems to look for
				equipment?		*		
	i	i.	safety and	emergency equi;	oment?	<u>×</u>		
	ii	ii.	security d	evices?		X		
	i	iv.		and structural e		<u>×</u>		
		٧.	for during	oblems to be loo the inspection ing, defective p	(e.g.		X	
	•	vi.		frequency (base le deterioration ipment)?		£		
c	i.		areas subj daily when	ect to spills in use?	nspect-	<u>x</u>		•
6	₽•	an	inspection	or operator mailog or summary itor inspections	of	<u>×</u>		 but none since
1	f.		s the inspe lowing info	ection log conta ormation:	in the			May. Improve to check-list.
		i.	the date a	and time of the	inspection?	X		
		ii.	the name o	of the inspector	?	X		
	i	ii.	a notation made?	of the observa	tions		4	
		iv.		and nature of an			<u>×</u>	
Do per			training ro	ecords				
ı	ą.	Job	titles?				X	 Could not find
	b.	Job	descripti	ons?		<del></del>	X	 Could not find records in file

			YES	NO	ΝI	Remarks
	с.	Description of training?		X		
	d.	Records of training?		×		
	е.	Did facility personnel receive the required training by 5-19-81?			×	
	f.	Do new personnel receive required training within six months?	-		NA	
	9.	Do personnel training records indicate that personnel have taken part in an annual review of initital training?	_	×		
•	req	required, are the following special uirements for ignitable, reactive, incompatible wastes addressed? 265.1	17			
	a.	Special handling?	×			
	b.	No smoking signs?	X			**************************************
	c.	Separation and protection from ignition sources?	X			

### Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1.	Maintenance and Operation of Facility: 265.31	YES	, NO	NI	Remarks
	Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	x	NO	11.2	·
2.	If required, does the facility have the following equipment: 265.32	Δ.			hazardous floor sweepings behind drum pile
	a. Internal communications or alarm systems?	X			inter com
	b. Telephone or 2-way radios at the scene of operations?	×			
	c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	X	-		scap, Respirators, gloves, absorbant, extinguishers
)	Indicate the volume of water and/or fo	am avai	lable	for fi	ire control:
3.	Testing and Maintenance of Emergency Equipment: 265.33	· · · · · ·			
	(a. Has the owner or operator established testing and maintenance procedures for emergency equipment?	X			Nyr. ext. + Air Pack
	b. Is emergency equipment maintained in operable condition?	X			
4.	Has owner or operator provided immediate access to internal alarms? (if needed) 265.34			NA	none
5.	Is there adequate aisle space for unobstructed movement?	×		- Andrews	
6.	Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?	/ _*X	<del></del>		not documented

### Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

YES NO NI Remarks

1.	Does	the	Contingency	Plan	contain	the
	follo	owing	information	n:	265.52	

- a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
- b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
- c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
- d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
- e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)
- 2. Are copies of the Contingency Plan available at the <u>site</u> and local emergency organizations? 265.53

need wording that

coordinator will immediately

notify Feds + State of

emergency + that written

report will be filed within 184,

NA municipal - no arrangements needed

×

no documentation that plan has been sent

			YES	NO	NI	Remarks
3.	Eme	rgency Coordinator 265.55		,		
	a.	Is the facility Emergency Coordinator identified?	<u>X</u>			
	b.	Is coordinator familiar with all aspects of site operation and emergency procedures?	X			
	с.	Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<u>x</u>			
4.	Eme	ergency Procedures 265.56				
	at Cod	an emergency situation has occurred this facility, has the Emergency ordinator followed the emergency occurred listed in 265.56?		,	NA	100 Cm 8548.W51/

			5	Section E:	MANIFEST SYSTEM,	RECORDKE	PING,	AND RE	PORTING:	(Part 265 Subpart E)
						YES	NO	NI	Remarks	
*	۱.	Use	of h	Manifest Sys	stem 265.71					
		à.	prod prod (Par the gene	cedures list cessing each rticularly s signed mani	ity follow the ced in §265.71 for manifest? sending a copy of ifest back to the in 30 days after	<u> </u>				
		b.		records of ained for 3	past shipments years?	X		<del></del>		
*	2.	req	uire	ments regard	operator meet ding manifest 265.72			NA	indicat	e no discrepancies
*	of	on-s	ite	facilities 1	rs or operators that do not off-site sources	<b>.</b>				
	3.	0pe	rati	ng Record	265.73					
		a.	mai rec	s the owner ntain an ope ord as requ	_	X	. <del></del>		-	
		b.	con	s the opera itain the fo ormation:		·				
•	,	•	i.	of each was storage, o	(s) and date(s) ste's treatment, r disposal as n 40 CFR Part 269 ?	, <i>\(\lambda\)</i>		· <u>—</u>	<u>revis</u>	e to meet App. I
			ii.	each hazar facility? should be to specifi	on and quantity dous waste within (This informati cross-referenced c manifest numbers accompanied best.)	n the on r,			ON &	HWMF
(		***;	iii.		iagram of each sposal area					

<sup>\*\*\*</sup> only applies to disposal facilities

	YES NO NI	Remarks
showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	NA	
iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	<u>x</u> <u>ex</u>	op inspections
v. Reports detailing all incidents that required implementation of the Contingency Plan?	<i>NA</i>	NB incidents
vi. All closure and post closure costs as applicable?	<u>×</u>	Post closure NA.
. Availability of Records 265.74		
Are all facility records required under 40 CFR Part 265 available for inspection?	<b>X</b>	
.**Unmanifested Waste Reports 265.76		
a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or or shipping paper?		•
b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.		
	•	

<sup>\*\*</sup> Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

### Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

		YES NO	NI	Remarks		
1.	Are containers in good condition? 265.171	<u>×</u> _				
2.	Are containers compatible with waste in them? 265.172	<u>×</u> _		·		
3.	Are containers managed to prevent leaks? 265.173	<b>X</b> _				
4.	Are containers stored closed?	X		containers of waste		
5.	Are containers inspected weekly for leaks and defects.	X		generated on-site (floor sweepings) were not closed		
6.	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if	265.776				
	waste is ignitable or reactive).		NA			
7.	Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177		<u>NA</u>			
8.	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient			-		
	distance?	·	. NA			

### Section J - TANKS (Part 265, Subpart J)

YES NO NI Remarks

1.	Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192	×		
2.	Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures?		NA	
3.	Do continuous feed systems have a waste-feed cutoff?		<u>pa</u>	
4.	Are waste analyses done before the tanks are used to store a substantially different waste than before?	5.193		NA
5.	Are required daily and weekly inspections done? 265.194	X		
6.	Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? 265. Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	198 		μΑ
ţ	Are incompatible wastes stored in separate tanks? 265.199 (If not, the provisions of -40 CFR 265.17(b) apply.)			<u>Au</u>
8.	Has the owner or operator observed the buffer zone requirements for tanks cont			
	Tank capacity: <u>५,०००</u> gallons			
	Tank diameter: 4 feet			
	Distance of tank from property line		<u> </u>	eet feet
	(See table 2 - 1 through 2 - 6 of NF Code - 1977" to determine compliance		1 ammat	ole and Combustible Liquids

Section A:	Scope
------------	-------

1.	hazar	ete this Appendix if the owner or operator dous waste that is subsequently shipped off sposal.	of a -site	TSD f for	acilit treatm	y also generates ent, storage,
Sect	ion B	: MANIFEST REQUIREMENTS (Part 262, Subpart	В)			
			YES	NO	NI	Remarks
(1)		the operator have copies of the manifest lable for review? 262.40	X			
(2)	mont	nine manifests for shipments in past 6 ths. Indicate approximate number of fested shipments during that period.		1	4,00	gal per shipment
(3)	foll copi fest	the manifest forms examined contain the lowing information: (If possible, make less of, or record information from, manities) that do not contain the critical ments). 262.21				
	a.	Manifest document number?	X			
	b.	Name, mailing address, telephone number, and EPA ID number of Generator	x		*	
	с.	Name and EPA ID Number of Transporter(s)?	Ł			
; ;	d.	Name, address, and EPA ID Number Designated permitted facility and alternate facility?	X			
•	e.	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	×			
	f.	The total quantity of waste(s) and the type and number of containers loaded?	<u>x</u>			
	g.	Required certification?	x			
	h.	Required signatures?	X			<del></del>
(4)	Rep	ortable exceptions 262.42				
	a.	For manifests examined in (2) (except for enter the number of manifests for which the signed copy from the designated facility was ment.  Name	e gen	erato	r has !	NOT received a
	b.	For manifests indicated in (4a), enter the has submitted exception reports (40 CFR 26 tor.	numb 2.42)	er fo to t	r whic he Reg	h the generator ional Administra-

Sec	tion	C: PRE-TRANSPORT REQUIREMENTS (Part 262, Su	bpart	C)		
<b>)</b>	with (Red	waste packaged in accordance n DOT regulations? quired prior to movement of ardous waste off-site) 262.30	YES	NO	NI	Remarks
2.	in a cond (Red	waste packages marked and labeled accordance with DOT regulations cerning hazardous waste materials? quired for movement of hazardous te off-site) 262.31 262.32	· 		<u>×</u>	
3.		required, are placards available to nsporters of hazardous waste? 262.33	X		<del></del>	
4.	wast with and to	site accumulation of generated hazardous wast te it generates either (A) in its storage fac h 40 CFR 262.34 [see 265.1(c)(7)]. Option B containers. If the installation elects option Section D. If the installation elects option ns: See 40 CFR 262.34 January 11, 1982 Revi	restrion A, a B, co	[265] icts a check omplet	.1(b)] all acc < this te the	or (B) in accordance cumulation to tanks box I and skip following observa-
	a.	Is each container clearly marked with the start of accumulation date?		opt.	ion B NA	for still bottoms tank
	b.	Have more than 90 days elapsed since the date inspected in (a)?	<del></del>	X		
	c.	Do wastes remain in accumulation tanks for more than 90 days?		X		
•	d.	Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?		X	,, 	
Sec	tion	D: - RECORDKEEPING AND REPORTING (Part 262,	Subpa	rt D)		
1.		all test results and analyses ded for hazardous waste deter-	YES	NO	NI	Remarks
	min	ations retained for at least ee years? 262.40	X			
Sec	tion	E: - INTERNATIONAL SHIPMENTS (Part 262, Sub	part E	)		
1.		the installation imported or orted Hazardous Waste? 262.50		<u> </u>		
•		answered Yes, complete the following applicable.)	•			

Exporting Hazardous waste; has a generator:

# Appendix TR

	·	YES	NO	N]	]	Remar	*s			
Sect	ion A: SCOPE:					χ.				
1.	Complete this Appendix if the owner or operator transports hazardous waste subject to 40 CFR 263.10.	<u>X</u>				<del></del>	·			
2.	Does the transporter transport hazardous waste into the U.S. from abroad?		K				• .,		<del> </del>	<del></del>
3.	Does the transporter transport hazardous waste out from the U.S.?		$\underline{\underline{Y}}$	<i>,</i> 						
4.	Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?		×			<del></del>			·	
Sec	tion B: MANIFEST SYSTEM AND RECORDKEEPING	(Part	263	یا	Subp	art B	)			
	Are copies of <u>completed</u> manifests available for review and retained for three years. 263.22	X								
2.	Estimate the number of manifests for shipments completed during the part 6 months.		<u>e</u> 0	<del></del>			i proje		•	
3.	Examine a representative number of manifests. Indicate number examined.		15		,	•				
4.	Did transporter properly sign and date the manifests examined?	X	•			<del></del>	·			
5.	Do any manifests indicate shipments delivered to other than the designated facility? 263.21		<u> </u>	,				·		
	If (5) is "no," skip 6 and 7.	_	_			···		<del></del>		
6.	Do any manifests indicate shipments delivered to other than an alternate facility?					-				و د ادروت
7.	Are shipments delivered to alternate facilities only because emergency prevents delivery to the designated facility?									-
		. –								



WILLIAM G. MILLIKEN, Governor

STEVENS T. MASON BUILDING BOX 30028 LANSING. MI 48909

#1340

### **DEPARTMENT OF NATURAL RESOURCES**

HOWARD A. TANNER, Director
Hazardous Waste Division
Detroit Area
9311 Groh Road
Grosse Ile, Michigan 48138

RECEIVED

JAN 1 1 1983

January 6, 1983 EPB-FIELD STAFF

Mr. Michael J. Tepatti Branch Manager Detrex Chemical Industrial, Inc. Gold Shield Solvent Division 12886 Eaton Avenue Detroit, Michigan 48227

Re: MID091605972

Dear Mr. Tepatti:

NATURAL RESOURCES COMMISSION

JACOB A. HOEFER

CARL T. JOHNSON E.M. LAITALA

HILARY F. SNELL

JOAN L. WOLFE

HARRY H. WHITELEY

CHARLES G. YOUNGLOVE

On January 4, 1983, your facility was inspected to determine compliance with Subtitle C of the Resource Conservation and Recovery Act. (RCRA) of 1976, as amended. The facility transport stores, treats and generates hazardous wastes and is subject to the Act.

Inspection found that you have satisfactorily corrected or accounted for the deficiencies found during our previous, January 26, 1982, inspection. No additional violations were noted.

Thank you for your cooperation. If you have any questions, please contact me at (313) 675-0860.

Yours truly,

HAZARDOUS WASTE MANAGEMENT DIVISION

William E. Stone

William E. Stone

Water Quality Specialist

WES/sc

cc: Al Howard, (2)

RECEIVED
[JAN 12 1983

ACT 64



### RCRA Inspection Report

EPA Identification Number: $M = I$	09160	5912
Installation Name: Detrex Chemic	al Ind. Inc Gold Shie	id Div.
Location Address: 12886 Ea	ton Ave.	
City: Detroit	State: <u>Mich</u>	
Date of inspection:	Time of inspection (from)	9a (to) 11:30a
Person(s) interviewed	Title	Tel ephone
Barbara Hooper	Clerk	313) 491-4550
Michael J. Tepatti	Branch Manager	•
Inspector(s)	Agency/Title	Tel ephone
William E. Stone	Mich. DNR-HWD/was	3/3) 675-0860
Installation Activity (mark only on	e box)	<pre>Inspection Form(s)</pre>
Ireatment/Storage/Disposal per 4 Generation and/or Transportation	O CFR 265.1 and/or	A
	eneration or Transportation	) _ A
☐ Generation and Transportation		В, С
☐ Generation only		В
		CECEIVED
		<b>JAN 12</b> <sub>1983</sub>
C: Al Howard (2) Detrex		ACT 64
Detrex		

RCRA Inspection Report
Detrex Chemical Industries, Inc.
Gold Shield Solvents Division
12886 Eaton Avenue
Detroit, Michigan 48227

#### MID091605972

The facility is a small degreasing solvent, Freon, TCE, 111 TCE, PERC and Methylene Chloride, distributor.

Virgin material comes in bulk by tank truck or tank car, is stored in outside aboveground tanks and is repackaged into drums at the plant.

As a service the facility buys and hauls drums of spent degreaser (F001 & F002) from their customers. The purchased spent solvent is returned to the plant and the drums are stored inside in a contained area. Periodically the dirty solvent is processed in an atmospheric still and the recovered solvent is packaged in drums and sold back to the original customer.

The still bottoms (F001 & F002) are stored in an indoor tank (containment is provided). Chemical Recovery, a licensed Act 64 hauler and disposer, picks up the bottoms monthly and disposes of the material at their facility.

sc

cc: al Howard (2) Detrex Detrex

#### INSPECTION FORM A

### Section A: SCOPE OF INSPECTION.

- 1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
- Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit appli	catio	n process(es) (EPA Form 3510-3)	Inspection Form /	A section(s)
\$01	M	storage in containers		I
\$02	X	storage in tanks		J
T01	П	treatment in tanks		J
\$04	П	storage in surface impoundment		K,F
T02	П	treatment in surface impoundment		K,F
D83	П	disposal in surface impoundment		K,F
\$03	П	storage in waste pile		L
D81	П	disposal by land application		M,F
D80	$\Pi$	disposal in landfill	•	N,F
т03	П	treatment by incineration	•	0/P
т04	X	treatment in devices other than t impoundments, or incinerators	anks, surface	Q
ther activitie	<u>s</u> .			
GENERATO	R XI		APPENDIX	GN

- 3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

  Pg. 3 of 5 should read

  Sol Toll So2

  Line 2 Fool Sol Toll So2
- 4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

N.A.

TRANSPORTER X

**APPENDIX** 

TR

	Section	n B: GENERAL FACIL	ITY STAN	IDARDS:	(Part	265 Subpart B)
			YES	NO	NI*	Remarks
١.	Has the Regional Ada been notified regar					
	a. Receipt of haza waste from a fo					N.A
	b. Facility expans	ion?				//
	c. Change of owner	or operator?				N.A.
2.	General Waste Analy	sis: 265.13				
		r operator obtained ical and physical waste?	X			Are taking in spent
		or operator have e analysis plan facility?	×			degreaser that facility ariginia supplied to customers as virgin material.
	and analysis of	analysis plan res for inspection each movement of from off-site?	X		· .	-
3.	Security - Do secur (if applicab	ity measures includ le) 265.14	le:			
	a. 24-Hour surveil	lance?	X			ADT
	b. i. Artificial o	or natural and facility?				
	ji. Controlled	entry?				
	<pre>c. Danger sign(s)     entrance?</pre>	at	X			
4.	Owner or operator i	nspections: 265.15				
1	a. Does the owner inspect the factor malfunctions, conservator errors of hazardous was	cility for deterioration, s, and dischanges				
	may affect huma the environmen		X		<del></del>	

			YES NO NI	Remarks
b.	have	s the owner or operator e an inspection schedule the facility?	<u>X</u>	•
c.		so, does the schedule address inspection of the following ns:		
	i.	monitoring equipment?	<u>X</u>	<del> </del>
,	ii.	safety and emergency equipment?	<u>*</u>	·
i	ii.	security devices?	<u> </u>	
	iv.	operating and structural equip- ment (i.e. dikes, pumps, etc.)?	<u>x</u>	
	٧.	type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	<u>X</u>	
	vi.	inspection frequency (based upon the possible deterioration rate of the equipment)?	X	-
d.		areas subject to spills inspect- daily when in use?	<u> </u>	
e.	an	s the owner or operator maintain inspection log or summary of er or operator inspections?	<u> </u>	
f.		s the inspection log contain the lowing information:	./	
	i.	the date and time of the inspection	n? 볼 💹	
	ii.	the name of the inspector?	<u> </u>	
	iii.	a notation of the observations made?	<u>*</u>	
	iv.	the date and nature of any repairs or remedial actions?	X	

. Job descriptions?

Job titles?

At corporate

			YES	NO	NI	Remarks
	c.	Description of training?	X			
	d.	Records of training?	X			signed contigency plan
	e.	Did facility personnel receive the required training by 5-19-81?			×	
	f.	Do new personnel receive required training within six months?			X	
	9•	Do personnel training records indicate that personnel have taken part in an annual review of initital training?			X	· .
6.	req	required, are the following special quirements for ignitable, reactive, incompatible wastes addressed? 265.	17			
	a.	Special handling?	_			N.A.
	b.	No smoking signs?				N.A.
	C•	Separation and protection from ignition sources?				N.A.

### Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1.	Maintenance and Operation of Facility: 265.31	YES	NO	NI	Remark s
	Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?		<u>X</u>		· ·
2.	If required, does the facility have the following equipment: 265.32				
	a. Internal communications or alarm systems?	<u>X</u>			
	b. Telephone or 2-way radios at the scene of operations?	X		<del></del>	
	c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	X			oil dry
	Indicate the volume of water and/or foa			for fir	re control:
	5 CO2 - ABC ext	Linaush	ers		
	5 CO2 - ABC ext	J			
3.	Testing and Maintenance of Emergency Equipment: 265.33	•			
	a. Has the owner or operator established testing and maintenance procedures for emergency equipment?	X			•
	b. Is emergency equipment maintained in operable condition?	X			
4.	Has owner or operator provided immediate access to internal alarms? (if needed) 265.34	X		<del></del>	
5.	Is there adequate aisle space for unobstructed movement?	X			
6.	Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?	<b>~</b> /			

### Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

YES	NO	NI	Remarks

- Does the Contingency Plan contain the 265.52 following information:
  - The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
  - b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
  - Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
  - A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
  - An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)
- Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

	N.A.	Took	olan	to	department
		Took waste waste highly secondary	toxic contain	m Make	-noti
~		· · ·			

N.A. small plant
many exits

delivered to departments
by hand

		•	1F2	NU	N1	Kemarks
3.	Eme	rgency Coordinator 265.55				
	a•	Is the facility Emergency Coordinator identified?	*			
	b.	Is coordinator familiar with all aspects of site operation and emergency procedures?	×			
	c.	Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<u> </u>	<del></del>		·
4.	Eme	ergency Procedures 265.56				
	at. Cod	an emergency situation has occurred this facility, has the Emergency ordinator followed the emergency occurres listed in 265.56?				11 A

		•	9	Section E	: MANIF	EST S	YSTEM,	RECOR	DKEE	PING,	AND	REPORTING:	(Part 26	55 Subpart	E)
									YES	NO	NI	Remarks	<b>;</b>		
*	1.	Use	of N	Manifest	System	265	.71								,
		a.	proc proc (Par the gene	s the fac cedures l cessing e rticularl signed m erator wi ivery.)	isted in ach mani y sendin anifest	n §265 fest? ng a c back	.71 for copy of to the		X		-	-			<u>.</u> .
		b.		records ained for			nents		<u>X</u>						
*	2.	req	uire	e owner o ments reg ancies?		nanife						N-A	<del></del>		<del></del>
r*	of	on-s	ite	ole to ow facilitie waste fr	s that c	do not	t	s.							
	3.	0pe	rati	ng Record	265.7	3									
		a.	mai rec 265	s the own ntain an ord as re .73?	operatin quired i	ng in	·		X			inform of se	nation eperate	in numb	er_
		b.	con	s the ope tain the ormation:											
			i.	The meth of each storage, required Appendix	waste's or disp in 40 (	trea <sup>.</sup> posal	tment,	5	X		<del>7 / 1/2</del>	<del></del>			
			ii.	The loca each haz facility should be to specific waste by a mark	ardous wardous wardous was according to the many was according to the	waste s info -refe ifest	within ormation renced numbe	n the on r,				MA.	all w	asteis s	fored
		***i	ii.	A map or cell or								in on have	e loca 3 was	tion- i te type	only es

<sup>\*\*\*</sup> only applies to disposal facilities

			YES	NO	NI	Remarks
		showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)		•		N.A.
	iv.	Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	×			
	٧.	Reports detailing all incidents that required implementation of the Contingency Plan?				N.A.
	vi.	All closure and post closure costs as applicable?	X			Post Closure N.A.
4.	Availa	bility of Records 265.74				
		l facility records required 40 CFR Part 265 available for tion?	X			·
5.	**Unmani	fested Waste Reports 265.76				
	ha ge wi	s the facility accepted any zardous waste from an off-site nerator subject to 40 CFR 262.20 thout a manifest or or shipping per?		X	·	
	of de an	"a" is yes, provide the identity the source of the waste and a scription of the quantity, type, d date received for each unmanisted hazardous waste shipment.				
	•					

<sup>\*\*</sup> Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

### Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

		YES NO	NI	Remarks
1.	Are containers in good condition? 265.171	X_		
2.	Are containers compatible with waste in them? 265.172	<u> </u>		
3.	Are containers managed to prevent leaks? 265.173	<u> </u>		
4.	Are containers stored closed?	<u>X</u> _	<del></del>	
5.	Are containers inspected weekly for leaks and defects.	X_	*******	
6.	Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).	265.176		N.A.
7.	Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177			N.A
8.	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?			N A.

### Section Q - CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT (Part 265, Subpart Q)

		YES	NO	NI	Remarks
1.	Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure? 265.401	X			
2.	Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system)?			-	N.A
3 <b>.</b>	Has the owner or operator addressed the waste analysis requirements of 265.402?	X			
4.	Are inspection procedures followed according to 265.403?	1			
5.	Are the special requirements fulfilled for ignitable or reactive wastes? 265.405				N.A.
6.	Are incompatible wastes treated? (If yes, 265.17(b) applies.) 265.406				N.A.

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristics under 40 CFR §261.22, or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

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22	cti	On.	Δ.	Sc op	۵
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1.	Complete this Appendix if the owner or operator of a TSD facility also generates
	hazardous waste that is subsequently shipped off-site for treatment, storage,
	or disposal.

	Section B:	MANIFEST	REQUIREMENTS	(Part	262,	Subpart B)
--	------------	----------	--------------	-------	------	------------

ecti	ion B	: MANIFEST REQUIREMENTS (Part 262, Subpart	B)			
		·	YES	NO	NI	Remarks
1)		the operator have copies of the manifest lable for review? 262.40	X		·	
2)	mont	nine manifests for shipments in past 6 ths. Indicate approximate number of ifested shipments during that period.	, 	<i>خ</i> .	5,000gal	shipment or gal. of bottoms
3)	foll cop fest	the manifest forms examined contain the lowing information: (If possible, make ies of, or record information from, manities) that do not contain the critical ments). 262.21			still	bottoms .
	a.	Manifest document number?	X		-	
	b.	Name, mailing address, telephone number, and EPA ID number of Generator	×		•	
	C.	Name and EPA ID Number of Transporter(s)?	X		-	
	d.	Name, address, and EPA ID Number Designated permitted facility and alternate facility?	X	·		
	e.	The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	X		<del>-</del>	
	f.	The total quantity of waste(s) and the type and number of containers loaded?	X			
	g.	Required certification?	X			
	h.	Required signatures?	X			**************************************
(4)	Rep	ortable exceptions 262.42				
	a.	For manifests examined in (2) (except for enter the number of manifests for which the signed copy from the designated facility we ment.	e geno	erat	or has <u>t</u>	10T received a
	b.	For manifests indicated in (4a), enter the has submitted exception reports (40 CFR 26 tor.	numb 2.42)	er fo	or which the Reg	n the generator ional Administra-

Sec.	tion	C: PRE-TRANSPORT REQUIREMENTS (Part 262, Su	bpart	C)		
)			YES	NO	NI	Remarks
1.	with	waste packaged in accordance n DOT regulations? quired prior to movement of		NO	NI	remark 5
		ardous waste off-site) 262.30			X	`_Tank
2.	in a	waste packages marked and labeled accordance with DOT regulations cerning hazardous waste materials? quired for movement of hazardous				
		te off-site) 262.31 262.32			X	Tank
3.		required, are placards available to nsporters of hazardous waste? 262.33			X	
4.	was with and to	site accumulation of generated hazardous wast te it generates either (A) in its storage fac h 40 CFR 262.34 [see 265.1(c)(7)]. Option B containers. If the installation elects option Section D. If the installation elects option ns: See 40 CFR 262.34 January 11, 1982 Revi	ility restri on A, o B, co	[265. cts a check	l(b)] ll acc this	or (B) in accordance cumulation to tanks box and skip
)	a.	Is each container clearly marked with the start of accumulation date?				
	b.	Have more than 90 days elapsed since the date inspected in (a)?	*********			
	c.	Do wastes remain in accumulation tanks for more than 90 days?	<u></u>			
	d.	Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	_	<u> </u>	υ.Α. —	
Sec	tion	D: - RECORDKEEPING AND REPORTING (Part 262,	Subpar	t D)		
			YES	NO	NI	Remarks
1.	nee min	all test results and analyses ded for hazardous waste deter- ations retained for at least ee years? 262.40	X	/		
Sec	tion	E: - INTERNATIONAL SHIPMENTS (Part 262, Subp	part E	)		
1.		the installation imported or orted Hazardous Waste? 262.50	·	X	, 	
		answered Yes, complete the following applicable.)				
	a.	Exporting Hazardous waste; has a generator:				

			YES	NU	N I	Remarks	
ï		ified the Administrator in ting?					 
	ii.	Obtained the signature of the foreign consignee confiming delivery of the waste(s) in the foreign country?				مناور المراور والمراور والمراو	
	iii.	Met the Manifest requirements?					 
<b>b</b> •	the q	rting Hazardous Waste; has generator met the manifest					

### Appendix TR

		YES	NO	NI	Remarks
Sect	cion A: SCOPE:				`\
1.	Complete this Appendix if the owner or operator transports hazardous waste subject to 40 CFR 263.10.	X			
2.	Does the transporter transport hazardous waste into the U.S. from abroad?		X	•	
3.	Does the transporter transport hazardous waste out from the U.S.?		X	/	
4.	Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	***********	X		
Sec.	tion B: MANIFEST SYSTEM AND RECORDKEEPING	(Part	263	, Sub	part B)
1.	Are copies of <u>completed</u> manifests available for review and retained for three years. 263.22	X			
2.	Estimate the number of manifests for shipments completed during the part 6 months.		03		· 
3.	Examine a representative number of manifests. Indicate number examined.		15		<del>-</del>
4.	Did transporter properly sign and date the manifests examined?	X			
5.	Do any manifests indicate shipments delivered to other than the designated facility? 263.21		4	<i>_</i>	
	If (5) is "no," skip 6 and 7.				
6.	Do any manifests indicate shipments delivered to other than an alternate facility?				
7.	Are shipments delivered to alternate facilities only because emergency prevents delivery to the designated facility?	<u>.</u>		-	



NATURAL RESOURCES COMMISSION

CARL T. JOHNSON E. M. LAITALA DEAN PRIDGEON HILARY F. SNELL HARRY H. WHITELEY JOAN L. WOLFE CHARLES G. YOUNGLOVE

#### WILLIAM G. MILLIKEN, Governor

#### **DEPARTMENT OF NATURAL RESOURCES**

STEVENS T MASON BUILDING, BOX 30028, LANSING, MICHIGAN 48909
HOWARD A TANNER Director
Water Quality Division, District 1
9311 Groh Road, Grosse Ile, MI 48138

February 17, 1982

CERTIFIED MAIL
Mr. Will Robrecht
Assistant Manager, Engineering
Detrex Chemical Industries, Inc.
P.O. Box 501
Detroit, MI 48232

Re: Detrex Chemical Industries, Inc. Gold Shield Solvents Division 12886 Eaton Avenue, Detroit, MI MID 091605972

Dear Mr. Robrecht:

By this letter we are notifying you that the above facility is in violation of the requirements of Subtitle C of the Resource Conservation and Recovery Act. (RCRA) as amended. Specifically, it has been determined that Detrex Corporation is in violation of Section 3004 of RCRA (42 U.S.C. 6294).

On January 26, 1982, Susan Norton of the Department of Natural Resources inspected the plant. The purpose was to determine the facility's compliance with RCRA. The inspector found that:

- 1. Danger signs are not posted at each entrance to the active portions of the facility. This is in violation of 40 CFR 265.14 (c).
- 2. Operator inspections are not recorded in an inspection log or summary; this is in violation of 40 CFR 265.15 (d). Inspection records were not provided for malfunctions and operator error. This is in violation of 40 CFR 265.15 (a). Facility lacked a written schedule for inspections of all safety and emergency equipment, security devices, and operating and structural equipment. This is in violation of 40 CFR 265.15 (b): (1), (2), and (3). The inspection schedule must include the items and frequencies outlined in 40 CFR 265.15 (b): (4).
- 3. Personnel training records do not contain job titles, job descriptions, descriptions of training or records of training. This in in violation of 40 CFR 265.16 (a): (1) through (4).
- 4. There are no provision for communication (telephone or two-way radios) at the outside tanks used for still bottoms storage. This is in violation of 40 CFR



R1026 10/76

265.32 (b).

- 5. Information was not available regarding arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams. This is in violation of 40 CFR 265.37 (a) and (b).
- 6. There was no evacuation plan for the facility. This is in violation of 40 CFR 265.52.(f).
- 7. The Contingency Plan is not available at local emergency organizations. This is in violation of 40 CFR 265.53.
- 8. While manifests appeared in generally good order, one appeared without hauler certification by the facility. This is in violation of 40 CFR 263.20 (b).

You are requested to provide documentation to this office, within 30 days from the date of this letter, informing us of action taken to correct these violations. Please address your response to:

Michigan Department of Natural Resources Water Quality Division, District 1 Office 9311 Groh Road Grosse Ile, MI 48138

Please do not hesitate to call this office at (313) 675-0860 if there are any questions. Our appreciation is extended to the Gold Shield staff for their cooperation and assistance during the inspection.

Yours truly,

Water Quality Division

Roy E. Suring KITCH

Roy E. Schrameck, P.E. District Engineer

Duran Haidon

By: Susan Norton

Water Quality Specialist

cc: Mr. Joseph Hickman
Alan Howard

INI 2X29160597Z EPA IDENTIFICATION NUMBER Z65.11

#### RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS TREATMENT, STORAGE, AND DISPOSAL FACILITIES Form A - General Facility Standards

#### I. General Information:

(A)	Facility Name: DETREX CHEMICAL INDUSTRIES INC GOLD SHIELD SOLVENTS DIVISION
(b)	Street: 12886 EATON AVE
	City: <u>DETROIT</u> (D) State: <u>MICN.</u> (E) Zip Code: 48227
(F)	Phone: 313 -491-4550 (G) County: WAYNE
(H)	Operator: DET REX CHEMICAL INDUSTRIES INC - GOLD SHELD SOLVENTS DIVISION
(I)	Street: SAME AS AROVE
(J)	City: (K) State: (L) Zip Code
(in)	Phone: (N) County:
(0)	Owner: DETREX CHERICALE INDUSTRIES, INC.
(P)	Street: 4000 TOWN CENTER, JUITE 1100
(կ)	City: SOUTHFIELD (R) State: MICH (S) Zip Code: 48232
(T)	Phone: 313 - 358-5800 (U) County: WAYNE
(V)	Date of Inspection: Tan 26,9982 (W) Time of Inspection (From) 12:15 PM (To) 3:15 PM
(X)	Weather Conditions: BEIGHT CLEAR, COLD (CA. 15°F) - JUGHT BREEZE

,(Y),	Person(s) Interviewed	Title		<b>Tel</b> ephone
•	LOSEPH HICKMAN OPERATIONS	MANAGE	<u>e</u>	313-491-4550
	JOHN BIAMOND BRANCH MA	NAGER		313-491-4550
	GAPY WASYL MANAGER E	ENGINEER		313-491-4550
(2)	Inspection Participants	Ayency	Title Varyeal Resources	Telephone
		^	SPECIALIST	313-675-0860
		<del></del>		
(AA)	Preparer Information			
	Name Susan Norton	Agency Same as	/Title Asove	Telephone
	•			
	II.	SITE ACTI	VITY:	
	Complete sections I through VII fo facilities. Complete the forms (into the site activities identified	n parenthe	tment, storage, a sis) in section N	and/or disposal /III corresponding
<u>k</u> A	Storage and/or Treatment  T. Containers (I)	D.	Incineration and (O and P)	I/or Thermal Treatment
	<ul> <li>✓2. Tanks (J)</li> <li>3. Surface Impoundments (K) No</li> <li>4. Waste Piles (L) No</li> </ul>	<u>x</u> E.	Chemical, Physic Treatment (Q)	cal, and Biological
	• Lanu Treatment (M)			
	• Lanafills (N)			•

 ${\hbox{{\tt Note:}}}$  If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

# (Part 265 Subpart 6)

N/A = NO-SPALMBLE

, ^`.	•	Yes	No	NI*	Remark
(A)	Has the Regional Administrator been notified regarding:				
	1. Receipt of hazardous waste from a foreign source?	***********	*******		NOT APPLICABLE
	2. Facility expansion?  / 22.23 (6) 2	<del></del>			
(a)	General waste Analysis:				
	1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<u>X</u>		· <del></del>	
	2. Does the owner or operator have detailed waste analysis plan on tile at the facility?  265.13(b)	X	耋		CONSTEANALYSIS PLAN IS DRAFTED, BUT WAS SENT TO COEPORATE OFFICE FOR REVIEW AT TIME OF INSPECTION— SO A COPY WAS BROUGHT DOWN
	3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?  265.13(c)			<u>x</u>	DURING INSPECTION
(L)	Security - Do security measures includ (if applicable) 265.14	e:	•		
	1. 24-Hour surveillance? 265. M (6) /	X			ADT SUSTEM
	2. Artificial or natural barrier around facility? 265.14(6)2	_X_	<del></del>		NO HAZAROOUS WASTE IS OUTSIDE, EXCEPT FOR SINDERS IN TANES (STILL BONDED INSIDE
	3. Controlled entry? 265. 4(b) Zii	X		···	DIRES SURPOUND TANKS.
	4. Danyer siyn(s) at entrance?  265.14(c)		<u>x</u>		
(U)	Do Owner or Operator Inspections Include: 265./5				NO RECORDS OF INSPECTIONS
	Records of malfunctions? 265.15(a)/		<u>x</u>		ARE KEPT.
	2. Records of operator error? $245.6(a)$		<u> </u>		
	3. Records of discharges?		<u>x</u>		
	265.15(0)1				

## III. GERAL FACILITY STANDARDS - Cont ed

<b>A</b> .	•	•	Yes	No	NI*	Remarks
	4.	Inspection schedule:		X		SEE NOTE ABOVE
	5.	$Z_{65.15(a)}4$ Safety, emergency equipment?		<u>_X</u>		
	6.	265.75 (b)/ Security devices?		<u>X</u>		
	7.	z65.15(b)/ Uperating and structural				•
		devices 3 (b)/		<u>X</u>		
	8.	Inspection log? 265.15(d)		χ_		
E)		personnel training records lude: (Effective 5/19/81) 265.76(d)				THERE ARE NO PERSONNEL TRAINING
	1.	Job Titles?		X		RECORDS
	2.	Job Descriptions:		<u>X</u>		
	3.	Description of Training?		<u> </u>		
	4.	Records of Training?		Χ		
	5.	Have facility personnel received required training by 5-19-81?	X	,	<u> </u>	EMPLOYEES HAVE HAD SAFETY MEETING MAYE PEAD & UNDERSTAND CONTINGENCY
	6.	Do new personnel receive required training within six months?	X			PLAN; BUT NO RECORD OF THIS IS KEPT
(F)	req	required are the following special uirements for ignitable, reactive, or compatible wastes addressed?				N/A THERE NEE NO IGN! TABLE NAC.
	1.	Special handling?				WASTES AT THIS FACILITY OR  REACTIVE / INCOMPAT. WASTES
	2.	No smoking signs?		<del></del>		NA
	3.	Separation and protection trom ignition sources?				N/S

<sup>\*</sup>Not Inspected

# IV. PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

(n)	maintenance and Operation of Facility:	YES	N٥	NI	
	1. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	-	×	-	
(u)	If required, does the Facility nave the Following Equipment: 265.32	\			
	Internal communications or alarm systems? 265.32(a)	*			YES FOR INSIDE STERAGE; NO FOR. STILL-BOTTOM TANKS.
	2. Telephone or 2-way Radios at the scene of operations? 245.32(b)	<del></del>			STILL SCHOOL .
•	3. Portable fire extinguishers, fire control, spill control equipment and decontamination				ABSORBENT & PORTABLE PUMPS
	equipment? 265.32(c)	X			
	Indicate the volume of water and/or for zb5.32(d) Units: THERE ARE 5 PORTABLE COZ (AB	`			
	THERE IS NO SPRINKLER SYSTEM OR	FOAM 5	YSTEM	<del>,</del>	
(C)	Testing and Maintenance of Emergency Equipment:  265.33 RECONDESERVING REQUIRED UNDER	265.	15(b)	,	
	1. Has the Owner or Operator established Testing and Maintenance Procedures tor Emergency Equipment?	<u> </u>			ALARM SYSTEM (ADT) IS CNECKED DA. AFTER RE-SETTING. FIRE EXTINGUISNERS ARE TESTED YEARLY PUMPS ARE IN CONTINUOUS USE AND REPAIRED AS NEED OCCURS
	2. Is Emergency Equipment Maintained in Operable Conditions?	*			KEPAIRED AS 14EED (OCURS
(ຍ)	Has Owner or Operator Provided Innediate Access to Internal Alarms?				
	(if needed) 265.34	X			
Phot	Inspected	5			

	•		YES	16	NI	
ኑ.)		here adequate aisle space unobstructed movement?	X			· .
		265.35			<del></del>	
			AND C	んしひとも	ev noor	ertubre.
		V. CONTINGENCY PLAN (Part 265				EDUKES:
		(1410, 200	Jubp	מו כ ט		
A)	boes	the contingency Plan contain the				
	foll	owing information:	Yes	No	NI*	Remarks
)		The actions facility personnel must take to comply with \$265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	<u>X</u>		•	
	2.	Arrangements agreed to by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?		<u>X</u>		
	3.	Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	X			
	<ol> <li>4.</li> <li>5.</li> </ol>	A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a prief outline of its capabilities?  265.52(e)  An evacuation plan for facility personnel where there is a possibili that evacuation could be necessary?	<u>X</u> ty		- -	NO DISCUSSION OF CAPABILITIES (EG., VOLUME OF ROAM FROM EXTINGUISHERS)  ONLY 3 FEOPLE WORK AT PLANT:
		(This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)  265.52 (f)	-	X		EXITS ARE CLEARLY MARKED; PLANT IS ALSO A SMALL FACILITY.

### V.- CONTINGENCY PLAN AND EMERGENCY PROCEDURES Continued

		25	No	NI*	Remarks AVAILABLE AT SITE BUT NOT
(b)	Are copies of the Contingency Plan Available at Site and local Emergency X Urganizations?		X		AT EMERGENCY ORGANIZATIONS
	245.53				
(C)	Emeryency Coordinator  265.55  1. Is the facility Emeryency  Coordinator identified?	\ \			
	<ul><li>2. Is coordinator familiar with all aspects of site operation and emergency procedures?</li><li>3. Does the Emergency Coordinator</li></ul>	X			
	have the authority to carry out the Contingency Plan?	<u>X</u>			
(u)	If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	<del></del>			N/A
(A)	VI. MANIFEST SYSTEM, RECOMPLET ONLY ONE ERROR FOUND —  PLEASE SEE ATTACHED COPY OF  MANIFEST — ID, NAULER CERTIFICATION NOT  Use of Manifest System	Sut	opart E s No	.) NI*	REPORTING Remarks
	<ol> <li>Does the facility follow the procedures listed in §265.71 for processing each Manifest?         265.71(5)</li> <li>Are records of past shipments retained for 3 years</li> </ol>	<u>X</u> <u>X</u>			
(b)	) Does the owner or operator meet requirements regarding Manifest Discrepancies?	<u>\lambda</u>	<u> </u>		

# (Part 265 Subpart G)

(اُ	•	ny Record						
	1. Doe	s.93 s the owner or operator ntain an operating	VES	No	NI			
		ord as required in .73?	X					<del></del>
	con	s the operating record tain the following ormation:				٠		
	**b•	The method(s) and date(s) of each wastes treatment, storage, or disposal as required in Appendix I?	<u>X</u>					<del></del>
	C.	The location and quantity of each hazardous waste within the facility?	X	-	,			
	***d.	A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest			·			
		numbers if waste was accompanied by a manifest.)		<del></del>	·	N/X	<del></del>	
	е.	Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?	X					
	f.	Reports detailing all incidents that required implementation of the contingency plan?	,			N/A	· · · · · · · · · · · · · · · · · · ·	
	<b>y•</b>	All closure and past closure costs as applicable? (Effective 5-19-81)	X 羹	<b></b>		NO COPP C	DOED BE FOUND	BUT FOR

<sup>\*\*</sup> See page 33252 of the May 19 , 1980, Federal Register.

<sup>\*\*\*</sup> Unly applies to disposal facilities

# VIII. CLOSURE AND POST CLOSURE (Part 265 Subpart G)

			Yes	No	NI*	Remarks
(A)	Clos	sure and Post Closure				
	1.	Closure Plan Available for Inspection by May 19, 1981?	X			
	2.	265.112 (a) Has this plan been submitted to the Regional Administrator		X		N/S
	3.	265.1/2(c) Has Closure begun?	<del></del>	X	<del></del> .	,
	4.	Is closure estimate available by May 19, 1981?		X		DATE OF PLAN , 11/3/81
(B)	Post	t Closure Care and Use of Property			•	
	a Po	the Owner or Operator supplied ost Closure Monitoring Plan May 19, 1981)?				N/A
		265.117				
Faci	lity	(Part 265, SI  USE AND MANAGEN  DETREX CHEMICALS INDUSTRIES,  Name: GOLD SHIERD SOLVENTS DIVISI	I MENT C	OF CONT	TAINERS	nspection: Jan. 26,1982
			Yes	No	NI*	Remarks
	1.	Are containers in good condition?	X			
•	2.	Are containers compatible with waste in them?	X			
	3.	765.172 Are containers stored closed? 265.173(a)	<u>X</u>	<u> </u>		•
	4.	Are containers managed to prevent leaks?	X			
	5.	Are containers inspected weekly for leaks and defects?	$\nearrow$		*****	DAILY INSPECTIONS
	6.	265.174 : Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line?	Ind	licate i	f waste	N/A
		265.176		***************************************		

		Yes	No	NI*	- Remarks
7.	Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.) $265.17(a)$				N/B
	Are containers of incompatible wastes separated or protected from each other physical barriers or sufficient distance?		<u> </u>		N/S
	265. 197 (C)	J ANKS			•
Facility	Name: GOLD SILIFLD SOLVENTS DIV.	-	Date	of Ins	spection: <u>JAN. 26,1982</u>
1.	Are tanks used to store only those wastes which will not cause corrosic leakage or premature failure of the tank?  265.192(6)	on <u>,X</u>			
2.	Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containement structures?			· ·	N/A
3.	Do continuous feed systems have a waste-feed cutoff?		<u></u>		N/A - BITCH PROCESS
4.	Are waste analyses done before the tanks are used to store a substantially different waste than before?				N/A
5.	265.193(a) Are required daily and weekly inspections done?	<u>X</u>			
6.	Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	Ind	icate	if w	aste is: II Ignitable  Reactive  N/A
7.	265.198, 265.17  Are incompatible waste stored in separate tanks?  (If not, the provisions of 40 CFR 265.17(b) apply.)	,			, N/8

265.199

8.	Has the owner or operator observed Associations buffer zone requirement or reactive wastes?  Not Applie	ments for tanks containing ignitable
	Tank capacity:	gallons
	Tank diameter:	feet
	Distance of tank from property li	ine feet
	(See table 2 - 1 through 2 - 6 of Code - 1977" to determine compli	F NRPA's "Flammable and Combustible iance.)
	·	K E IMPOUNDMENTS
acility	Name: Nor Ar	Date of Inspection:
1.	Do surface impoundments have at least 60 cm (2 feet) of freeboard?	
2.	265.222 Do earthen dikes have protective covers?	
3.	Are waste analyses done when the impoundment is used to store a substantially different waste than before?	
4.	Is the freeboard level inspected at least daily?	
5.	265.226(a)/ Are the dikes inspected weekly for evidence of leaks or deterioration?	
6.	Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment	
7.	requirements.)  265.299(a) /  Are imcompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)	
	265.230	

L

### WASTE PILES

Yes No NI* Remarks  1. Are waste piles covered or protected from the wind?  2. Is each in-coming movement of waste analyzed before being added to the waste pile?  26.252  3. Are leachate, run-off, and run-on controlled? (The effective date of this provision is Nov. 19, 1981.)  26.253  4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)  26.2526(2)/  5. Are piles of reactive or ignitable waste protected?  20.5256(2)/  6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)  26.5.257(a)/  7. Are piles of imcompatible waste protected by barriers or distance from other waste?	acility		OT APPLICABLE		Date of	Inspection:	
from the wind?  2. Is each in-coming movement of waste analyzed before being added to the waste pile?  26.5.252  3. Are leachate, run-off, and run-on controlled? (The effective date of this provision is Nov. 19, 1981.)  26.5.253  4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)  26.5.256(a)  5. Are piles of reactive or ignitable wastes protected?  26.5.256(a)  6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)  26.5.257(a)  7. Are piles of imcompatible waste protected by barriers or distance from other waste?			Ye	s No	NI*	Remarks	
2. Is each in-coming movement of waste analyzed before being added to the waste pile?  265.252  3. Are leachate, run-off, and run-on controlled? (The effective date of this provision is Nov. 19, 1981.)  265.253  4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)  265.256(a)2  5. Are piles of reactive or ignitable waste protected?  265.256(a)2  6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)  265.257(a)  7. Are piles of imcompatible waste protected by barriers or distance from other waste?	1.		tected —		·		
3. Are leachate, run-off, and run-on controlled? (The effective date of this provision is Nov. 19, 1981.)  265.253  4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)  265.256(2)/  5. Are piles of reactive or ignitable waste protected?  265.256(a) <sup>2</sup> 6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)  265.257(a)  7. Are piles of imcompatible waste protected by barriers or distance from other waste?	2.	Is each in-coming movement of waste analyzed before being add to the waste pile?	ded 		*****	•	
4. Are reactive & ignitable wastes rendered non-reactive or nonignitable before storage in a pile? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)  265.256(a)/  5. Are piles of reactive or ignitable waste protected?  265.256(a)/  6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)  265.257(a)  7. Are piles of imcompatible waste protected by barriers or distance from other waste?	3.	Are leachate, run-off, and run- controlled? (The effective day of this provision is Nov. 19,	te				
ignitable waste protected?  265.256(a) <sup>2</sup> 6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)  265.257(a)  7. Are piles of imcompatible waste protected by barriers or distance from other waste?	4.	Are reactive & ignitable waster rendered non-reactive or non- ignitable before storage in a pile? (If waste is rendered no reactive or non-ignitable, see treatment requirements.)	✓ on-	ndicate	if waste	is: DIgnitable, D Reactive	
<ul> <li>6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)  Z65.257(α) </li> <li>7. Are piles of imcompatible waste protected by barriers or distance from other waste?</li> </ul>	5.	ignitable waste protected?					
7. Are piles of imcompatible waste protected by barriers or distance from other waste?	6.	Are incompatible wastes stored different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)					
	7.	Are piles of imcompatible wast protected by barriers or dista					

# LAND TREATMENT

FAcility	Name:	Date	e of	Inspe	ection	•	
.1.	Is hazardous waste capable of biological or chemical degradation?						
2.	265.272 (a)  Are run-off and run-on diverted from the facility or collected (Effective date: November 19, 1981)?  265.272(65c)						· · · · · · · · · · · · · · · · · · ·
3.	Is waste analyzed according to 265.273?				<del></del>	· · · · · · · · · · · · · · · · · · ·	
4.	If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?	Control September 1		, 			
5.	Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?						
6.	Does the unsaturated zone moni- toring plan address the minimum information specified in 265.278?						
7.	Are records kept regarding application dates, and rates, quantities, and locations of all hazardous waste placed in the facility?  265.279						
8.	Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes?	Indicate	;f 	waste	is ;	[ Ign table	- Reactive
9.	Are incompatible wastes land treated? (If yes, 265.17(b) applies) 265.282			-			

MIDOTIGOS 110

#### N LANDFILLS NOT APPLICABLE

			Yes	No	NI*	Remarks
(A)		ral Operating Requirements the facility provide the following:		,		
	**].	portions of the fill?				
	**2.	265:302(a) Collection of run-off from active portions of the fill? 265.302(b)				
	**3.	Is collected run off treated? 265,302(b)				
	4.	Control of wind disposal of hazardous waste?	-			
		(**Effective 11-19-81)				
(B)		veying and Recordkeeping the Operating Record Include:	·			
	1.	A map showing the exact location and dimensions of each cell?				
٠	2.	265.309(a) The contents of each cell and the location of each hazardous waste type withing each cell? 265.309(b)				·
(C)	Clos	sure and Post-Closure	•			•.
	1.	Is the Closure Plan available for inspection by 5-19-81?				
	2.	Has this plan been submitted to the Regional Administrator?			*****	
	3.		-	<del></del>		
	4.	Is Closure cost estimate available by 5-19-81? $265.142.(a)$				
(D)		ecial requirements <del>fro</del> ignitable or active waste				
	so	e ignitable or reactive wastes treate the resulting mixture is no longer mitable or reactive?	d 			
	7	265.317				

Nor	APPLICABLE
-----	------------

		Yes	No	NI*	Remarks
	(If waste is rendered non-reactive or non-ignitable see treatment requirements)				
	If not, the provisions of 40 CFR 265.17( apply.	(b)			
(E)	Special requirements for Incompatible Wastes.				
	Does the owner or ooperator dispose of incompatible wastes in separate cells?				
	265.3/3  If not, the provisions of 40 CFR 265.17(apply.	(b)			
(F)	Special requirements for liquid waste (effective 11-19-81)				
	1. Are bulk or non-containerized liquid placed in the landfill?	ds ——			
	265.314 (a)  2. Does the landfill have a chemically and physically resistant liner system?				
•	265.3/4(Q)/  3. Does the landfill have a functional leachate collection system? 265.3/4(Q)/			<u> </u>	
	4. Are fee liquids stabilized prior to or immediately after placement in the landfill?  265.314(a)Z				
(G)	Special requirements for Containers (effective 11-19-81)				
	Are empty containers crushed flat, shredded, or similarly reduced in volum before being, buried beneath the surfac of the landfill?  265.3/5(a)				
	265.3/3 (a)				

# 0 and P INCINERATION and THERMAL TREATMENT Not Applicable

(A)	Facility Na	me:				<del></del>	
(B)	Date of Ins	pection:				<del></del>	
			. •				
		I. De	terminatio	on of	Stea	dy State	<u>1</u>
Α.	Type of unit	(i.e., type of inci	nerator o	r the	rmal	treatmer	nt:):
В.	Components a	nd steady state cond	lition: 1	Z65,3	343	Th 26:	5. 373
			***	Was	this	componer	nt at SS prior to adding waste?
		Component		Yes	No	NI*	Remarks
1.							
			-				
2 <b>.</b>			_				
B.			_				
4. r			_				
5.			_				
			II. Was:		ıalysi	<u>S</u>	
A.	Minimum requ	irements, for wastes	not prev	iousl	y bur	ned/trea	ated.
	ana	uired analyses; has lysis been performed the following:	an ·	Yes	No	NI*	Remarks
	I 265.3 a.	95 77 265.375 Heating value					
	b.	Halogen content					
	C.	Sulfur content		***************************************			

		Yes	No	NI*	Remarks
•	2. Documented, written data may be substituted for analysis for these. Are either present			Nor ,	PPLICAB <b>L</b> E
'	for: I 265.345 Th 265.375				
	a. Lead?				
	b. Mercury?			<del></del>	
В.	Other parameters for which the waste is t steady state or determine the types of po Remarks any which you feel should be test	olluta	ints		
	1.	<del></del>		`	
	2.				
	3.				
	4.				
	5.			•	
	III. Monitori	ng and	i Ins	pections	
		Yes	No	NI*	Remarks
A.	Combustion/emission control instruments				
	monitored at least every 15 minutes			-	
В.	$z_{265.345(a)}$ Th $z_{65.347(a)}$ ! Steady state maintained or corrections attempted?				
c.	I 265.347 (a) 1 Th 265.377(a) 1 Stack Plume observed at least hourly for normal color and opacity?				
•	I 265.347(a) Z Th 265.377(a) Z				
υ.	Did any stack observations made by owner or operator show a plume dif-ferent than normal?**				
Ε.	I 265.347(a) Z  If yes to D above, were corrections made to return emissions to normal				
	appearance?**			·	
F.	I 265.347(a) Z Th 265.377(a) Z Complete unit and associated equipment inspected daily for leaks, spills,				· ·
G.	and fugitive emissions? I = 265.347(a)3 Th $265.377(a)3Emergency shutdown controls, systemalarms checked daily for proper$				
	operation? I 265.347 (a)3 Th 265.377(a)3			<del></del>	
	Not Inspected Specify in Remarks for what period of time	this	was	checked.	

### IV. Open Burning - No PPLICABLE

 $\dot{\textbf{A}}_{\bullet}$ . Only complete this part if the facility open burns hazardous waste.

		Yes	No	NI*	Remarks
1.	Does this facility burn only waste explosives?  (A No answer means other hazardous waste is open-burned.) 265.382				
2.	If this facility open- burns waste explosive, does it burn the waste at a distance greater than or equal to the minimum specified distance (below) 265.382				

265.382			
Pounds of waste explosives or propellants	burning		nation to the
0 to 100	380 m 530 m	670 1.250 1,730 2,260	ft ft

Q CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Faci	Tity Name: GOLD JOLVENTS				•	•
Date of Inspection: JAN. 26, 1982						
		yes	No	NI*	Remarks.	
1.	Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature	Y				
	failure?				<del></del>	
2.	Is a continously fed system equipped with a means of hazardous waste inflow stoppage or control					;
	(e.g., cut-off system?)			<del></del>	N/S	·····

١,		Yes	No	NI*	Remarks
	Has the owner or operator addressed the waste analysis requirements of 265.402?	<u> </u>	***************************************		(N/A)
4.	Are inspection procedures followed according to 265.403?		-		
5.	Are the special requirements fulfilled for ignitable or reactive wastes?	Ministracijima			N/X
	Are incompatible wastes treated? (If yes, 265.17(b) applies.)				N/S
	hazardous waste or that generate, st is a hazardous waste where such wast 402 or 307(b) of the Clean Water Act tanks, transport vehicles, vessels, hazardous only because they exhibit	ewaters (33 U. or cont	are S.C. ainer rosiv	subject 1251 et s which ity cha	to regulation under Sections seq.) and (2) neutralization neutraliz wastes which are racteristic under 40 CFR §261.22
•	complete this section if the owner or hazardous waste that is subsequently disposal.	i Subpar IX r operat	or of	a TSD	facility also generates
	or are listed as hazardous wastes in Complete this section if the owner or hazardous waste that is subsequently disposal.	i Subpar IX r operat	or of l off-	a TSD site fo	facility also generates
	or are listed as hazardous wastes in Complete this section if the owner or hazardous waste that is subsequently disposal.	IX coperates shipped	or of l off-	a TSD site fo	facility also generates
(A)	or are listed as hazardous wastes in Complete this section if the owner or hazardous waste that is subsequently disposal.  1. MANIF	IX coperates shipped	or of l off- QUIREM	a TSD site fo	facility also generates or treatment, storage, or
(A)	Or are listed as hazardous wastes in Complete this section if the owner or hazardous waste that is subsequently disposal.  1. MANIF  Does the operator have copies of the Manifest available for review?  262.23(a)3	IX coperates shipped	or of l off- QUIREM	a TSD site fo	facility also generates or treatment, storage, or
	Complete this section if the owner or hazardous waste that is subsequently disposal.  1. MANIF  Does the operator have copies of the Manifest available for review?  262.23(a)3  Do the Manifest forms reviewed contain the following information: (If possible, make copies of/or record information from, manifest(s) that do not contain the critical elements)  1. Manifest document number?  262.21(a)/	IX coperates shipped	or of l off- QUIREM	a TSD site fo	facility also generates or treatment, storage, or
	Complete this section if the owner or hazardous waste that is subsequently disposal.  1. MANIF  Does the operator have copies of the Manifest available for review?  262.23(a)3  Do the Manifest forms reviewed contain the following information: (If possible, make copies of/or record information from, manifest(s) that do not contain the critical elements)  1. Manifest document number?	IX coperates shipped	or of l off- QUIREM	a TSD site fo	facility also generates or treatment, storage, or

in accordance with DUI Regulations
concerning hazardous waste materials?
(Required to movement of hazardous
waste off site)

26 Z. 31 49 CFR PART 172

(C) If required, are placards available
to transfer?

Z6 Z. 33 49 CFR PART 17Z, SUBPART F

### 3. On Site Accumulation

		Yes	No	NI*	Remarks
1.	Are containers marked with start of accumulation date? 262.34(a)3				n/A
2.	Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days  262.34(a)/ IF NO, THE FACILITY MUST	- RF e-			N/A
3.	Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	;		OR DISPE	
4.	If wastes are stored in tanks, are the tanks managed according to the following requirements?				
	a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?  . 265. 192 (b)	<u>X</u>	deplements.		
	b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?			·	M/B
	c. Do continous feed systems have a waste-feed cutoff?				N/S
	d. Are required daily and weekly inspections done?	X			
	e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or				
	non-ignitable, see treatment requirements?  265.198, 265.17		*******		N/A
	f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)				NA
	265.199		-		,

## VI. RECORDKEEPING and REPORTING (Part 262, Subpart D)

		Yes	No	NI*	Remarks
(A)	Exception Reports, and all test results and analyses retained for at least three years?  265.71(a)5	X			•
(B)	Has the Generator submitted Annual Reports and Exception Reports as required?				N/A
	VII. INTERN (Part 26	ATIONA 2, Sub	L SHI	PMENTS E)	
(A)	Has the installation imported or exported Hazardous Waste?  265.50		4		N/A
	(If A was answered Yes, then co	mplete	e tne	TOLLOWI	ng as applicable.)
	1. Exporting Hazardous waste, has a generator:	APPLI	CABLE	-	
	a. Notified the Administrator in writing? 262.50(b)/		***************************************		· · · · · · · · · · · · · · · · · · ·
	b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?  262.50(b) 2	·		<u> </u>	
	c. Met the Manifest requirements?	·. ——			
	262.50(b)3  2. Importing Hazardous Waste, has the generator: 262.50(d)				
	a. Met the manifest requirements?	<del></del>			

#### TRANSPORTER REQUIREMENTS 40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

## I. MANIFEST SYSTEM AND RECORDKEEPING (Subpart B)

		Yes	No	NI*	Remarks
(A)	Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?	<u>X</u>			
	263.226)				
	II. INTERNAT	IOINA	L SHIP	MENTS	
Α.	Does the Transporter record on the manifest the date the waste left the U.S.?	APP.	LICABLE		
В.	263. $zo(f)$ / Are signed completed manifest(s) on file? $z_{63}.z_{20}(q) + z_{63}.z_{20}(f)^2$				
		CELL A	NEOUS		
	V. TILS	CLLLA	IIIL OOS		
<b>)</b>	Does Transporter transport hazardous waste into the U.S. from abroad	. <u>.</u>	X	********	N/K
В.	Does the Transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	•			N/A - ONE DOT DESCRIPTION
	263.10(c) 2				
					•
NOT	If (A) or (B) were answered "Yes" then comply with the Generator regulations.	the	Transp	orter i	is also a Generator and must
	Z63.10(c)				

\*Not Inspected

#### REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

COMPANY IS A DEGREASING SOLVENT DISTRIBUTORSNIP, CAPTIVE TO DETREX MATERIAL COMES IN BY WAY OF TANK TRUCK OR TANK CAR (RR), THIS IS REPACKAGED AND SOLD. ANY SPILLAGE WOULD BE RECLAIMED ON SITE.

CONTAMINATED SOLVENTS ARE ALSO PICKED UP FROM CUSTOMERS, REDISTILLED AND SOLD BACIC, STILL BOTTOMS ARE NAULED AWAY BY USNER OIL CO (LICENSET HAULER). THE SOTN THE WASTE TO BE REPROCESSED AND THE STILL BOTTOMS COME UNDER FOOL & FOOL

THE BARCELS OF CONTAINATED SOLVENT AWAITING RECYCLING ARE STORED INSIDE A CONCRETE-FLOORED. BRICK-WALLED BUILDING, AND HUMBER ABOUT 40. THE SWOODE FROM RECLAMATION IS STORED OUTSIDE IN Z DIKED TANKS, CYLINDRICAL INSNAPE AND TOTALLY CLOSED.

I. GENERATOR DESCRIPTION AND DISPOSITION OF WASTE (MUST BE FILLED IN		D. GENERATOR CERTIFICATION:	
A. GENERATOR OF WASTE: / FACILITY NUMBER _		THIS IS TO CERTIFY (OR DECLARE) UNDER PENALTY OF PERJURY THAT THE MATERIALS DESCRIBED IN 1/B /	
NAME TENNESSES AND		PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND ARE IN PROPER CONDITION I TRANSPORTATION ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION A	
ADDRESS 1021 n. Blic 1866e St., Curuma.	, ml 48817	THE U.S. ENVIRONMENTAL PROTECTION AGENCY.	
- (1)	1 1911 1811/1711	NAME & TITLE (please print) SIGNATURE DATE	
PRODUCER ORDER NOSHIPME	NT DATE	Armold $n = 1, 15 \pm 1, 15 \pm 1$	
PERSON TO CONTACT AFRICA AFRICA	PHONE 517-7-3-3-3	Keep goldenrod copy for your records. Send pink copy to:	
B. DESCRIPTION OF WASTE (Mandatory) HAZARD CLA	ss: <u>ORT - A FUTE</u>	DEPARTMENT OF NATURAL RESOURCES, WATER QUALITY DIVISION, P.O. BOX 30028, LANSING, MI 48	309
SHIPPING NAME: (DOT OR EPA)		II. HAULER OF WASTE (MUST BE FILLED IN BY HAULER).	
SIC PHYS. TYPE OF OLIANTITY	UNIT WASTE PERCENT TYPE SOLIDS	ADDRESS	
· [ .: m 3 .		AUUNCOO	
CODES:	. · · · · · · · · · · · · · · · · · · ·	TELEPHONE NUMBER PICK-UP DATE da.	ı
	SLUDGE •	B. HAULER JOB NUMBERFACILITY NUMBER	,
CONTAINER TYPE 1 = 55 GAL. DRUM 2 = BULK TANK 3 = SELF CONTAINED	UNITS 4 = OTHER (Specify)	C. VEHICLE LICENSE NO STATE	
UNIT 1'= CU.YDS. 2 = GALLONS 3 = POUNDS.		D. HAULER CERTIFICATION:	
WASTE TYPE (SEE INSTRUCTIONS) 99 = OTHER (Specify)		THIS IS TO CERTIFY UNDER THE PENALTY OF PERJURY THE WASTE DESCRIBED IN PART I/B OF THIS MANIFEST	
•	. ,	IN THE ATTACHMENT WAS ACCEPTED BY ME FOR TRANSPORTATION TO THE PROCESSING FACILITY NAMED IN PA	RI
MAJOR COMPONENTS (GREATER THAN 1% CONCENTRATION)	CONCENTRATION	NAME AND TITLE (please print)   SIGNATURE   DATE	—
	Upper % Lower %	· · · · · · · · · · · · · · · · · · ·	
, TRICHLORETHYLEHE	70 10	Keep canary copy for your records.	
1. THE OFFICIAL PROPERTY	$\frac{70}{10}$ $\frac{10}{5}$	Keep canary copy for your records.	
2		III. PROCESSOR OF WASTE (MUST BE FILLED IN BY TREATMENT/STORAGE/DISPOSAL FACILITY)	
3.		FACILITY NUMBER 111 (15317599	
4	<u> </u>	A. NAME	
5		BOSES ECTON AVEIUM DISTORM, MICH 40227	
6		ADDRESS	
CATE IF THE WASTE CONTAINS ANY OF THE MATERIALS LISTED IN TABLE TWO	<b>).</b>	TELEPHONE NUMBER 492 4550 ACCEPTANCE DATE 3 17 81	
PARAMETER NO.	CONCENTRATION	B. PROCESS METHOD:	•
1 1 1 1 1-1 1 1-1 1		INCINERATION RECLAMATION OTHER (Specify)	
	<del>-</del>	C. CERTIFICATION:	
		THE HAULER NAMED ABOVE DELIVERED THE WASTE DESCRIBED IN PART 1/B OF THIS MANIFEST TO THIS PROCES	ING
·	·	FACILITY. IT WAS ACCEPTABLE MATERIAL FOR PROCESSING UNDER THE TERMS OF FEDERAL, STATE, AND LOG	
EMERGENCY SPILL INFORMATION STORED IN LEAK PRO	OF GUITAINERS, LUND	REGULATIONS. I CERTIFY (OR DECLARE) UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE A CORRECT.	lND
The Land Court Fools is to Light France	TO PARTELL ACCESS TO	NAME AND TITLE (please print) SIGNATURE DATE	
\$2, \$0, 500 to 0.		3. 2. 41 12 25 Jun. 3/ 30 10 20 00 00 3-17.81	
C: NAME OF HAULER C. ED LA TIALD CLEVE TS		Keep green copy for your records. Send white copy to:	_
1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1	1. 61	DEPARTMENT OF NATURAL RESOURCES, WATER QUALITY DIVISION, P.O. BOX 30028, LANSING, MI 48	
NAME OF PROCESSOR SALE		Promise 3-1	7-
MANUE OF PROCESSOR		1/consider of	,
SITE ADDRESS		Ret. 6.3	52

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM AT 517-373-7660, 24 HOURS PER DAY AND THE NATIONAL RESPONSE CENTER AT 800-424-8802

### MICHIGAN DEPARTM OF NATURAL RESOURCES

EPA Form 8700-22 (Rev. 9/88)

Please print or type

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1.800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1.800-244-8802 24 HOURS PER DAY.

•						
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Failure to file is cunishable u section 299 548 MCL or Sect Act 136, PA 1959

	section 299 548 MCL of Act 138, PA 1959	
PR. 🗆		95
	ed. OMB No. 2050-0039	
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MANIFEST-MANIFESTE

THIS MANIFEST CONFORMS TO ALL FEDERAL AND PROVINCIAL TRANSPORT AND ENVIRONMENTAL LEGISLATION REQUIRING MANIFESTING.

e of authorized Person (print)

Pont autorisé (caractères d'imprimerie)\_

CE MANIFESTE EST CONFORME AUX LÉGISLATIONS FÉDÉRALE ET PROVINCIALE SUR L'ENVI, ET LE TRANSPORT, REQUÉRANT UN MANIFESTE

Tel., No. (Area Code) - No de tel. (ind reg i

LEGISLATION REQUIRING MANIFESTING. ET LE TRANSPORT, REQUERANT UN MANIFESTE. 4094169-2 Marylest Releience No. Nº de réference du manifeste B CARRIER CONSIGNOR (GENERATOR) Provincial ID No. - Nº d'id. provincial. Provincial ID No. - Nº d.id. provincial Reference No. s of Other Manifest(s) used TRANSPORTEUR XPEDITEUR (PRODUCTEUR) M 1 10 CO 11 npany Name · Nom de l'entreprise Company Name - Nom de Lentreprise C CONSIGNEE (RECEIVER) Gold Shield Solvents Div. of Detrex Corp. (RECEPTIONNAIRE) ing Address-Adresse postale City - Ville Postal Code - Code postal Consignee Information same as in Part A 12 in ... L'information à fournir par le destinataire est la même qu'en A MMMA IF NOT, COMPLETE SHADED AREA - SINON, REMPLIE L'ESPACE OMBRAGE oping site Address - Origine de L'expédition Postal Code · Code postal 1104-160 And the second of the second --- 12886 Eaton Street CHUMMA Registration No. - Nº d'immatriculation Address Adjress (California) is to his many the state of Postal Code · Code postal MI 48227 Detroit Vehicle - Vehicule nded Consignee - Destinataire prévu Trailer Rail Car No. 1 - 1º remorque - wagor Postal Coopy Code postal TRICIL (SARNIA) Trailer/Rail Car No. 2 - 2º remorque - wagon Point of Entry Point of Exit Point d'entrés Point de sortie Receiving Site Address' Destination de l'expediti ess - Adresse Carrier Certification: I declare that I have received wastes as offered by the consignor in Part A for delivery to the intended consignee and that the information contained in Part B is complete and correct. RR #1 Telferside Road Déclaration du transporteur: J'atteste avoir reçu les dechets offens par l'expéditeur dans la partie A en vue de leur livraison au destinataire choisi et que les renseignements inscrits à la partie B sont exacts et complets Postal Coupy Code postal eiving Site Address - Destination de l'expédition Name of authorized person (brint) ONT NON 1GO Corunna Postal Code - Code postal Date Received - Date do réception Prov. Tel No (Area Code) - Nº de tel (ind. reg. Yr. An Mon mois Day Jour CLEIRPAINDON Identify Any Shipment Discrepancy
A Protegna Atlach Addendum II
Handling
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a Caxpedition Annager une leuille Waste Identification Packaging Decontamination · · · Identification du déchei Contenants Shipping Name of Waste Appellation reglementaire du déchet Contenants a Metable Nº Provincial No. Lori **TDGA PIN** Quantity Shipped No. (Quebec - Ontario only) Yes No Yes Ho ou kg Quantite expediee (Québec - Ontario seul) au besoin. tion Ou Non Ou: Undes Waste Water contaminated III 01 0: 9.1 with Trichloroethylene cial Handling Emergency Instructions Circulation No - Quebec only If Handling Code \*Other\* (Specify) \*\* 🗟 🖔 Si code de manutention divers spécifier utention spéciale/Instructions d'urgence Cr-jointes Ci-dessous Nº de circulation - Réservée au Québec -If waste to be transferred specify intended company name :... wasie to be trasiteries specify intended company name S) jes déchets doivent être transférés, préciser le nom du destinataire In case of emergency contact generator listed above or TRICLL-(Sarnia) LTD.1-800 Scheduled Arrival Date Date d'arrivee prévue Shipped - Date d'expédition An Mon - Mois Day - Jour Yr. - An Mon - mois Day - Jour Consignee Certification: I declare that the information contained in Part C is correct and complete Déclaration du destinataire. Je déclare que tous les renseignements à la partie C sont vericiques et comple ignor Certification: I declare that the information contained in Part A is correct and complete. Name of authorized Person (print) - Nom de l'agent autorise (caracteres d'imprimerie) aration de l'expéditeur. Je déclare que tous les renseignements à la partie A sont véridiques et complets.

# DNR MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE

Required under authority of Ac 1979, as amended and Act 136 1969

Failure to file is punishable under section 299 548 MCL or Section 1 Act 136, PA 1969

Please print or type Form Approved. OMB No. 2050-0039 Expires 9-3 1. Generator's US EPA ID No. 2. Page 1 Manifest Information in the shaded are UNIFORM HAZARDOUS ocument No is not required by Fede WASTE MANIFEST T b b b lt 6 0 5 9 Generator's Name and Mailing Address A. State Manifest Document Number 1652388 COLD SHIELD SOLVENTS DIV. OF DETREX CORPORATION B. State Generator's ID 12886 Eaton Avenue 4. Debroit's Michigan - HID091605972 (313) 491-4550) 5. Transporter 1 Company Name C. State Transporter's ID 111727001 US EPA ID Number RR#1 D. Transporter's Phone 519-564-10: TRICIL (SARNIA) LTD. CORUNHA ONT 700119904 Transporter 2 Company Name US EPA ID Number E. State Transporter's ID F. Transporter's Phone 9. Designated Facility Name and Site Address 10. US EPA ID Number G. State Facility's ID TRICIL (SARNIA) LTD. H. Facility's Phone RR#1 TELPERSIDE ROAD H T 7 2 7 8 8 1 9 9 8 4 519-864-1021 CORUMNA, ONTARIO BON 160 I. Waste 11. US DOT Description (including Proper Shipping Name, Hazard Class, and Total Unit No. IĎ NUMBER). Quantity Type Wt/Vo a. BO. WASTE TRICHLOROETHYLENE ORM-A UH 1710 (FOO2) 17 P. 0. 0. b 0 c d. K. Handling Codes for Wastes Additional Descriptions for Materials Listed Above 1.5 a/ Listed Above. F002 a) TRICIL CODE CI 15. Special Handling Instructions and Additional Information Point of exit from U.S. Port Huron, Hichi FF Date of Exit 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. and conforms to the conditions of the attache EPAn ackness and generated to the degree! have determined be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes present and future threat to human health and the environment; OR; if I am a small quantity generator, I have made a good faith effort to minimize my wa generation and select the best waste management method that is available to me and that I can afford. Date Month Day Printed/Typed Name Signature 7 1027 Controller Ron Hritzkoviu 17. Transporter 1 Acknowledgement of Receipt of Materials Date Printed/Typed Name Signature Month Day 10127 18. Transporter 2 Acknowledgement or Receipt of Materials Date Printed/Typed Name Month Day Signature 19. Discrepancy Indication Space

ALL SPILLS MUST BE REPORTED TO THE CENTER AT 1-800-424-8802 24 HOURS PER

RESPONSE

AND THE NATIONAL

AT 517-373-7660

STATE

9

MICHIGAN AT 1-800-292-4706 OR OUT

Z

EMERGENCY ALERTING

POLLUTION

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in them 19.

Signature

Month Day

WANIFEST CONFORMS TO ALL FEDERAL AND PROVINCIAL TRANSPORT AND ENVIRONMENT.

LEGISLATION REQUIRING MANIFESTING.

LEGISLATION REQUIRING MANIFESTING.

LEGISLATION REQUIRING MANIFESTING.

	***		Manifest Reference No. Nº de réference du manifeste	4094367-2
A CONSIGNOR (GENERATOR) Provincial ID No N° did. provincial  EXPEDITEUR (PRODUCTEUR)	TRANSPORTEUR	INSSHIII	Reference No 's of Other Manifest N° s de réferences des autres man	
COMPANY Name - Nom de l'entreprise : GOLD SHIELD SOLVENTD DIV. OF DETREX CORP	Company Name - Nom de l'entreprise	enin Lo	C CONSIGNEE (RECEIV DESTINATAIRE (RECEPTIONNAIRE)	(ER)   Provincial ID No. N° did provincial
Mailing Address-Adresse postale City - Ville Prov. Postal Code - Code postal	Address Address & 1	÷	Consignee information same as in L'information à lournir par le destin	Part Ard Laving Color Distance and the Section 2015 Color Color
Shipping site Address - Origine de Lexpedition  12886 EatponStreet	City Color COLONNA	Postal Code - Co	Company Name Nom de l'entropn	56
City - Ville         Prov.         Postal Code - Code postal           Detroit         MI         48227	Vehicle - Vohicula	Registration No Nº. d'immatriculation	Address Adresse	
Intended Consignee - Destinataire prévu Provincial 10 No. Nº d'id provincial  TRICIL (SARNIA)	Trailer/Rail Car No 1 - 1 <sup>st</sup> remorque - wagon  Trailer/Rail Car No 2 - 2 <sup>st</sup> remorque - wagon	D58 379 (	Ony Villa	Prov. Postal Coor postal
Address · Adresse City · Ville Prov Postal Code · Code postal	Point of Entry Poet Nu Ro		Receiving Site Address - Destination	
R R #1 TELFERSIDE ROAD  Receiving Site Address - Destination de Lexpedition	delivery to the intended consignee and that the in Déclaration du transporteur: J'arteste avoir reçu le de leur livraison au destinataire choisi et que les au	es dechets offerts par l'expediteur dans la partie eseignemen <del>ts inacut</del> s à la partie B sont exacts et co	A en vue	Piöby Postal Code Postal
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IN case of emergency contact generator li TRICIL (Sarnia) LTD 1-800-265-7549	sted above or LYVII	er e	Si les déchets doivent être transféré du destinataire	s. préciser le nom
Date Shipped - Date d expédition Yr - An Mon - Mois Day - Jour Time - Heurs DA.M. DP.M.	Scheduled Arrival Date Date d'arrivee prevue Yr - An Mon - mois Day - Jour		Consignee Certification: I declare tha	City Ville Proving the City City City City City City City City
Consignor Certification: I declare that the information contained in Part A is correct and complete.  Declaration de l'expéditeur: Je déclare que lous les renseignements à la partie A sont véridiques et complete.	s .		Name of authorized Person (print)	Nom de l'agent autorisé (caracteros d'imprimerie)
Plame of authorized Person (print) Nom de La∗ent autorisé (caractères d'imprimerie)  Signature	en-7/.	31/3 (Area Code) · N° de 161 (Ind. 1	(eg ) Signature	Tel. No. (Area Code) - Nº de tel. (ind. règ.)
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#### DNR D MICHIGAN DEPARTMENT OF NATURAL RESOURCES

EPA Form 8700-22 (Rev. 9/88)

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Form Approved. OMB No 2050-0039 Expres 9:30:0 Please print or type Information in the shaded areas UNIFORM HAZARDOUS 1. Generator's US EPA ID No. Manifest 2. Page 1 2 Document No. is not required by Federal HIIDO9169397 WASTE MANIFEST 3. Generator's Name and Mailing Address State Manifest Document Number 1652389 GOLD SHIELD SOLVERTS DIV. OF DETREX CORPORATIN AT 517.373.7660 AND THE NATIONAL RESPONSE 12886 Eaton Ave B. State Generator's ID 48227 **9** 313) 491 4550 4. Detroit Phichigan HID 091605972 5. Transporter 1 Company Name US EPA ID Number C. State Transporter's ID MIT27001 TRICIL (SARNIA) LTD. CORUNIA ONT. RRFL 0019 D. Transporter's Phone 519-064-1 7. Transporter 2 Company Name E. State Transporter's ID F. Transporter's Phone 9. Designated Facility Name and Site Address US EPA ID Number G. State Facility's ID TRICIL (SARNIA) LTD RR fil Telferside Road H. Facility's Phone 519 864 1021 RON1G9 Corunna, Catario 12.Containers 13 14. I. Waste 11. US DOT Description (including Proper Shipping Name, Hazard Class, and Total Unit No. IĎ NUMBER). HM Type Quantity OF STATE **₩**/Vc a. E N X RQ Waste Trichlorouthylene Orm-A Ε (F002) 0 1 TT 6,0,5,0 G F | 0 | 0 | 2 UH 1710 MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM. IN MICHIGAN AT 1-800-292-4706 OR OUT DAY. R b. T 0 C. đ. K. Handling Codes for Wastes Additional Descriptions for Materials Listed Above al Listed Above b/ F002 a) Tricil Code cl d/ 15. Special Handling Instructions and Additional Information Point of Exit from U.S. Port Huron, Hich · Date of Exit 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. and conforms to the conditions of the attached In a light with the property of the property o **克巴斯尼埃人名** Date : Month Day Printed/Typed Name 10-30-89 Controller Date 17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Signature: Month Day 110131016 SUNTHEIS 18. Transporter 2 Acknowledgement or Receipt of Materials Date Month Day Printed/Typed Name Signature 19. Discrepancy Indication Space 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. 4 Date Signature Month Day

THIS MAN T CONFORMS TO ALL FEDERAL AND PRO	OVINCIAL TRANSPORT AND ENVIRONM LEGISLATION REQUIRING MANIF	MENTA CE MANIFESTE EST CONFOR	ME AUX LÉGISLATIONS FÉDERAL ANT UN MANIFESTE	
			Manifest Reference No. N° de réference du manifeste	4094377-1
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S. Adresse City Ville Prov. Postal Code - Code post  CORUNNA ONTA NON-10	Carrier Certification. I declare that I have rece	Point de soille vived wastes as offered by the consignor in Part A for information contained in Part B is complete and correct, les dechets offerts par l'expéditeur dans la partie A en v	Receiving Site Address - Destination de	Q 1, N V
ng Site Address - Destination de L'expedition	de leur hvraison au desimataire choisi et que les re Yr - An Mon - Mors Day - Jour Name R 19 10 3 0 Nore	insergnements inscrits à la partie B sont exacts et complets of authorized person (print) in l'argini autorise (caractères d'amprimaire)	City Ville	Postal (2009) Code postat
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EPA Form 8700-22 (Rev. 9/88)

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as amended and Act 136, PA 16.9

Failure to file is punishable under section 299,543 MCt or Section 10 of Act 136, PA 1969

Form Approved OMB No. 2050-0039 Expires 9-30-91

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THIS MANIFEST CONFORMS TO ALL FEDERAL AND PROVINCIAL TRANSPORT AND ENVIRONMENTAL CE MANIFESTE EST CONFORME AUX LEGISLATIONS FÉDERALE ET PROVINCIALE SUR L'ENVIRONMENTAL

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EPA Form 8700-22 (Rev. 9/88)

1979, as amended and Act 136 PA

THIS MANIFEST CONFORMS TO ALL FEDERAL AND PROVINCIAL TRANSPORT AND ENVIRONMENTAL LEGISLATION REQUIRING MANIFESTING.

LEGISLATION REQUIRING MANIFESTING.

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CE MANIFESTE EST CONFORME AUX LEGISLATIONS FEDERALE ET PROVINCIALE SUR L'ENVIRONNY

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CE LE TRANSPORT, REQUERANT UN MANIFESTE.

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	on de l'expéditeur: Je déclare que tous	les ren	seignements à la parti		el complets	100	<u>//                                   </u>								l	•				. *		TiO Sessin	ຍາງ 📆
e 0! 9%)	authorized Person (print)  égeni autorisé (caractères d'impriment	es Yn /1	21150	Signature	/	M	Kre-X	7	Ter No	(Area C	odel·N 1/,	de tet	find reg	<u></u>	Signature					Tel No (Ari	ea Codej - t.	9351	.w

MIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE

B MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN IT 1:800-424-8802 24 HOURS PER DAY. Failure to file is punishable under section 299 545 MOL or Section 10 Act 136, PA 1993

PR ( Rev. (

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	<u> </u>	WASTE MANIFEST NIPOSTOS	7 1	10		I law.		,	
	<b>.</b> 3.	Generator's Name and Mailing Address COLD SHITELD SOLVERTS DIV. OF DETREX CORPORATION			A. St	ate Manifest C			
		12886 Eaton Avenue				ate Generator			
		dmtrait + Hichigan , 48227 (313) 491 4550			,	HID09160	5972		
	5.	Transporter 1 Company NameR 6. US EPA ID Num		_	C. St	ate Transporte	r's ID	17270019	317
		TRICIL (SARBIA) LTD. CORUMNA ONT. T 2 7 0 0 1 9 9 0	0 4	1	D. Tra	insporter's Ph	one ST	9-865-10	5 Y
	7.	Transporter 2 Company Name 8. US EPA ID Num	ber		E. St	ate Transporte	r's ID		
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	9.	Designated Facility Name and Site Address 10. US EPA ID Num	ber		G. St	ate Facility's	D		_
		TRICIL (SARNIA) LID.							
		RR \$1 TELYERSIDE ROAD			H. Fa	cility's Phone			
		Corunna, Ontario BON 1G0 MIT 2 7 0 0 1	91 91	OI &	l .	519 86			
	••				iners	13	14.	I. Waste	—
	11.	US DOT Description (including Proper Shipping Name, Hazard Class, and HM ID NUMBER).		۱o.	Туре	Total Quantity	Unit Wt Va	No.	N/F
	a.						11		
v		RQ, Waste Trichlorouthylene ORM-A	1		, 1				
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	J. ,	Additional Descriptions for Materials Listed Above				ndling Codes ted Above	for Wa	<sup>stes</sup> a/ /	!
		a) Tricil Code "A"				102	٠.	b/ /	
				77	1	N/A		<del></del>	
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	<u>:</u>		· .		٠.	· · · · · · · · · · · · · · · · · · ·		d/ /	
1	15.	Special Handling Instructions and Additional Information Point of	ex	lt :	TOE	U.S. Port	Euro	on, Hichi	RJ:
		Date of							
	16.	GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and	d accu	rately	describe	d above by			
		proper shipping name and are classified, packed, marked, and labeled, and are in all respects in dro according to applicable international and national government regulations.	per co	ndition	for tran	sport by highway		the street	ha.
		if I am anarge quantity general service that have a program in place to reduce the volume							
İ	1	to be economically practicable and that I have selected the practicable method of treatment, si	torage	e, or d	sposal c	currently available	e to me 1	which minimizes	the
		present and future threat to human health and the environment; OR; if I am a small quantity of generation and select the best waste management method that is available to me and the	genera	tor, I	have ma	de a good faith	effort to	minimize my wa	aste
		generation and scient the section in the section in the section of the section in			<b>∂</b>			Date	
		Printed/Typed Name Signature Signature			<del>/</del>				Yea
1	1	Ronald E. Swan Branch Manager	وكم	ركليب	Contraction of the second			1	80
,	17.	Transporter 1 Acknowledgement of Receipt of Materials	3		·	<del></del>		Date	in the
		Printed/Typed-Name - Signature	٠,٨		<del></del>		<del></del>	Month Day	Yea
5	- 5		112				•	1/21/21	80
5	18.	Transporter 2-Acknowledgement or Receipt of Materials	71 74	كينينا	A17 (*******	•		Date	
R T	-	Printed/Typed Name - Signature						Month Day	Yea
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-	19	Discrepancy Indication Space						<del></del>	
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L	20	Facility Owner or Operator: Certification of receipt of hazardous materials covered	l by th	nis m	anifest	except as note	ed in		
Y		Item 19.			,			Date	<del>-</del>
		Printed/Typed Name Signature	<u>.</u>	<del></del>				Month Day	Yea
		· · · · · · · · · · · · · · · · · · ·						•	

THIS MALL CONFORMS TO ALL FEDERAL AND PROVINCIAL TRANSPORT AND ENVIRONMENTAL CE MANIFESTE EST CONFORME AUX LEGISLATIONS FÉDÉRALE ET PROVINCIALE SUB-FENVIRONNEMENT ... LEGISLATION REQUIRING MANIFE ET LE TRANSPORT, REQUERANT UN MANIFESTE. B CARRIER A CONSIGNOR (GENERATOR) Provincial ID No - N° did provincial Reference No.'s of Other Manifest(s) used Nºs de références des autres manifestes utilisés TRANSPORTEUR EXPEDITEUR (PRODUCTEUR) Company Name - Nom de l'entrepris Company Name - Nom de Lentreprise **CONSIGNEE (RECEIVER)** Provincial ID No. - Nº did provincial DESTINATAIRE Cold Shield Solvents Div. of Detrex Corp (RÉCEPTIONNAIRE) Address - Adresse F NOT, COMPLETE SHADED AREA - SINON, REMPLIA L'ESPACE OMBRAGE Postal Code - Code posta Ethioperis site Address - Origine de L'expedition 12886 Eaton Avenbue Registration No. - Nº d'immatriculation Prov Postal Code - Code postal Tr. 1 2 . . . Detroit, 48227 hale recognitive explanation and Provincial ID No - N° did provincial Trailer/Rail Car No. 1 - 1" remorque - wagon Postal Code - Code posta Tricil (Sargia) Trailer Rail Car No. 2 - 2º remorque - wagon Point of Entry Point of Exit Porot de sortie Receiving Site-Address - Destination de l'expédition Postal Code - Code posta Carrier Certification. If declare that I have received wastes as offered by the consignor in Part A for a delivery to the intended consignee and that the information contained in Part B is complete and correct. TO di Telferside Road Déclaration du transporteur. J'atteste avoir recu les déchets offerts par l'expéditeur dans la partie A en vue dir leur livraison au destinataire choisi et que les rensoignements inscrits à la partie B sont exacts et complets. 13 to Address - Destination de L'expedition Name of authorized person (print) Mon - Mors Day - Jour Corunda, Postal Code - Code postal Tel No (Area Code) - Nº de tel (ind. reg. Signature Corunna, (11) (12) (13) Ont. HONICO Decontamination Waste Identification Packaging Décontamination Identification du dechet , Problems, Attach Addendum if. Contenants, Handlino Shipping Name of Waste \*I \* Necessary. A Units Urxts Indiquer toute différence relative Appellation reglementaire du déchel Nº Provincial No. Codes L or Code de L'or/ **TDGA PIN Quantity Shipped Quantity Received** No 4 A l'expédition. Annexer une feuille (Quebec - Onlario only) Yes | No ou ka nanuten No I TMD NIP Quantité expédiée Quantité recu : (Ouchec - Ontario smill) Non Waste Water contaminated 01 02 with trichloroethylene · Handeng Emergency Instructions Altached Below Gridessous Circulation No. - Quebec only If Handling Code "Other" (Specify) Annulantion speciale Instructions d'urgence Nº de circulation - Réservée au Ouèbec Si code de manutention "divers", spécifier If waste to be transferred specify intended company name Provincial ID No - No did. provincial In case of energency contact generator listed above or Si les déchets doivent être transférés, préciser le nom Tricil (Sarnia) LTD 1-800-265-7549 Address - Adresse Jate Shipped - Date d'expédition Scheduled Arrival Date Date d'arrivée prévué Mon - Mois Day - Jou Consignee Certification: I declare that the information contained in Part C is correct and complete Déclaration du destinataire. Je déclare que tous les renseignements à la partie C sont véridiques et compl ance Certification: I declare that the information contained in Part A is correct and complete ion de l'expediteur. Je déclare que tous les renseignements à la partie A sont véridiques et complets, honzed Person (punit) 🕠 Tel No (Area Code) - Nº de léi (ind rég.) Tel No. (Area Code) - N" de tél (ind rég autorisé (caractères d'imprimerie) Mailed by Consignee to Consignor: Postée par le destinataire à l'expéditeur

AIRBILL PACKAGE TRACKING NUMBER

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ompany  GCLD SHIELD SOL reet Address		Department/Floor No.	U.S.	Enforcement E.P.A. (5HF	1-12)	Department/Floqi No.
12886 LATON AVE	State ZIP Required	2 6 7	City	South Dearbor ago, Ill IF HOLD FOR PICK-UP, Print F	State	ZIP Required 60604-1505
YOUR INSERNAL BILLING REFERENCE INFORMA	HUN (First 24 characters will appear on invoice.)	,		Street Address	EVEX AUGUSS NOTE	
PAYMENT 1 Bill Sender 2 Bill Recipient's F	edEx Acct No 3 Bill 3rd Party FedEx Acct No	D. 4 Bin Credit Car		City	State	ZIP Required
SERVICES (Check only one box)	DELIVERY AND SPECIAL HANDLING	MEIGHT IN PRINTS	YOUR DECLARED OVER WALUE SIZE	Emp. No.	Date	Federal Express Use
Priords Overnight Service (Delfker) by next business moning)  Standard Overnight Service (Delfker) by next business afternoon()	1 HOLD FOR PKK-UP (Fill in Box H) 2 DELIVER WEEKDAY	1	:	Cash received  Return Shipment  Third Party  Chg. To	Det. Chg 1	Base Charges  To Hold Declared Value Charge
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16 FEDEX LETTER * 56 FEDEX LETTER *	4 DANGEROUS GOODS (Exira charge) (CSS not available for Dangerous Goods Shipments)  5 CONSTANT SURVEILLANCE SVC. (CSS) (Edra charge) (Release Squature Not Applicable)	Total Total	Total	City	State Zi	Other 2
13 FEDEX BOX 53 FEDEX BOX	6 DRY ICE Lbs .			Received By:	<del></del>	Total Charges
14 FEDEX TUBE 54 FEDEX TUBE	7 OTHER SPECIAL SERVICE	DIM SHIPMENT (Heavy	j	X Date/Time Received Fe	dEx Employee Num	Der REVISION DATE 11/89 PART # 119501 FXEM (1/90)
Economy Service Heavyweight Service (for Extra Large or any (lormerly Standard Air) package over 150 lbs.)	9 SATURDAY PICK-UP (Extra charge)	Hecenor 1 D Regular Stop			·	FORMAT #014
business day+) 70 HEAVYWEIGHT **  30 ECONOMY 80 DEFERRED HEAVYWEIGHT **	10	2 ☐ On-Call Stup	4 门 B S C 5 门 Station	Release Signature:		● 1989 F E C PRINTEΩ IN
† Delivery commitment may be later in some areas. *Declared Value Limit \$100. **Call for delivery schedule.	12 HOLIDAY DELIVERY (II offered) (Extra charge)	FedEx Emp No		Date/Time		USA

## INFORMATION REQUEST RCRA ENFORCEMENT BRANCH APPROVAL (Delegation 8-8)

AUTHORITY: RCRA §3007 only	CRA §3007 and CERCLA	§104						
INSTALLATION NAME: Detrex Chemical In	dustries							
LOCATION ADDRESS: 12886 Eaton Avenue	LOCATION ADDRESS: 12886 Eaton Avenue							
CITY: Detroit	CITY: Detroit							
STATE: MI ZIP: 48227								
REGISTERED AGENT:								
IS THE MATTER IN RCRA LITIGATION OR UNDER A COURT ORDER?  NO  YES (Concurrence by Regional Counsel is required).								
A. DRAFT	<u>INITIALS</u>	DATE						
1. REB Staff Name A, Kubs SECTION:   IL/IN MI/WI OH/	MN IL/MI/WI I IN	12/10/95 1/0H/MN						
2. REB Section Chief	BL	12-12-95						
3. ORC Attorney Name (Only if the matter is in RCRA Lit or under court order)	igation							
B. FINAL	1.1	11						
1. REB Staff	uek.	10/13/95						
2. REB Section Chief	RL PL	1-2/13/45						
3. ORC Attorney (For Litigation Consultation only)								
4. REB Chief	ME.	12/13/95						
5. Assoc. Director, Office of RCRA (only if CERCLA §104 authority is referenced)								
6. WMD Director (only if CERCLA §104 authority is referenced)								